

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

BINTA P. MAMADOU, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:20-cv-146 (AJT/IDD)
	)	
STANLEY KYUNGJIN CHO, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**ORDER**

On June 24, 2022, following an entry of default judgment as to liability, Plaintiffs Binta P. Mamadou and Visions Braid Bar, LLC moved for a default judgment as to damages, attorneys’ fees, and costs against Defendants Shadetree Management LLC, Ellen Kim, and Stanley Kyungjin Cho (together, the “Shadetree Defendants”). [Doc. No. 198] (the “Motion”). Plaintiffs sought \$32,966.49 in damages, \$649,228.50 in attorneys’ fees, and \$10,099.43 in litigation costs with post-judgment interest at the statutory rate. *Id.* The Shadetree Defendants opposed the Motion. [Doc. No. 204]. On March 28, 2023, the Magistrate Judge issued a Report and Recommendation (the “R&R”), [Doc. No. 240], granting the Motion and recommending a total award of \$692,294.42 to Plaintiffs. No objection to the R&R has been filed. The Court has conducted a *de novo* review of the evidence in this case<sup>1</sup> and adopts and incorporates the findings and recommendations of the Magistrate Judge with respect to compensatory damages and litigation

---

<sup>1</sup> The Shadetree Defendants did not file an objection to the R&R. While the Court is therefore not required to review the magistrate judge’s factual or legal conclusions if there is no objection, *Thomas v. Arn*, 474 U.S. 140, 150 (1985), it is nevertheless “free, after review, to accept, reject, or modify any of the magistrate judge’s findings or recommendations.” *Wallace v. Hous. Auth. of Columbia*, 791 F. Supp. 137, 138 (D.S.C. 1992) (citation omitted).

costs, and for the reasons that follow adopts in part the R&R with respect to attorneys' fees and will instead award \$323,625.38 in fees.

## **I. BACKGROUND**

The Court has previously summarized this case at length, but in relevant part, Plaintiffs filed suit in 2020 against Bae's Woodberry, LLC; Chan Hee Bae; and Young Woo Bae (together, the "Bae Defendants") and the Shadetree Defendants. Centrally, Plaintiffs alleged discrimination and tortious interference with prospective economic relations based on Defendants' alleged refusal to lease commercial property to Plaintiffs on account of Mamadou's race and West African ancestry. *See* [Doc. No. 125] (summarizing the case). On November 6, 2020, the Court granted summary judgment in favor of the Bae Defendants, leaving only the Shadetree Defendants remaining in the case. *Id.*

On February 19, 2021, Plaintiffs moved for default judgment as to liability against the Shadetree Defendants. [Doc. No. 144]. The Magistrate Judge then recommended default judgment be entered against the Shadetree Defendants as to Counts I and II, but limited its recommendation to those two "discrimination counts in violation of federal law because they are central allegations in this matter, and the facts alleged support a finding of liability." [Doc. No. 155] at 14-18. The Magistrate Judge did not make any recommendations or findings with respect to Counts III-V as alleged in the Amended Complaint. The Court then declined to adopt the Magistrate Judge's recommendation, finding "entry of a default judgment is not warranted at this point." [Doc. No. 163] at 3. However, roughly two months later the Court considered Plaintiffs' renewed request for entry of default judgment and entered judgment against the Shadetree Defendants as to their liability on Counts I and II—claims under 42 U.S.C. § 1982 and § 1981, respectively. [Doc. No. 178]. Default was not, and has not, been entered against the Shadetree Defendants on the remaining

Counts III-V. Plaintiffs later moved for a default judgment as to damages, attorneys' fees, and costs against the Shadetree Defendants. [Doc. No. 198] (the "Motion"). The Magistrate Judge ultimately recommended granting the Motion and awarding in full the requested \$32,966.49 in compensatory damages, \$10,099.43 in costs, and \$649,228.50 in attorneys' fees. [Doc. No. 240].

On June 6, 2023, the Court ordered Plaintiffs to advise on their position as to how the case should proceed with respect to the outstanding Counts III-V. [Doc. No. 241]. In response, Plaintiffs proposed "to withdraw Counts III through V in the Complaint so long as doing so does not affect their right to full recovery as recommended by Magistrate Judge Davis." [Doc. No. 242] at 1. Plaintiffs' position is based on their assumption that "analysis of the additional counts is not necessary to award full relief," and they therefore "support the Court's efforts to preserve resources and accordingly propose to withdraw the additional counts to facilitate resolution of the matter." *Id.* at 2.

## II. LEGAL STANDARD

While ordinarily a prevailing party in a civil suit is not entitled to attorneys' fees, statutory schemes can provide otherwise. *Ohio River Valley Envtl. Coal., Inc. v. Green Valley Coal Co.*, 511 F.3d 407, 413 (4th Cir. 2007) (quoting *Alyeska Pipeline Serv. Co. v. Wilderness Soc'y*, 421 U.S. 240, 247 (1975)). In § 1981 and § 1982 actions, courts, "in [their] discretion, may allow the prevailing party . . . a reasonable attorney's fee." 42 U.S.C. § 12205.

Under Fourth Circuit precedent, to award appropriate attorneys' fees district courts are to engage in a three-step process by (1) calculating the lodestar by multiplying the reasonable hours worked by a reasonable rate, (2) using the factors from *Johnson v. Georgia Highway Express Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974)<sup>2</sup> to determine the reasonability of the lodestar, and (3)

---

<sup>2</sup> In adopting *Johnson*, the Fourth Circuit has characterized the twelve factors therein as follows:

subtracting hours on unsuccessful claims. *McAfee v. Boczar*, 738 F.3d 81, 88 (4th Cir. 2013). Notably, *McAfee* quoted Supreme Court precedent for the proposition that the lodestar’s presumption of reasonableness “can only be overcome ‘in those rare circumstances where the lodestar does not adequately take into account a factor that may properly be considered in determining a reasonable fee.’” *Id.* at 88-89 (quoting *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 553-54 (2010)). But *Perdue* was about a 75 percent *enhancement* that was applied, resulting in an attorneys’ fee award of roughly \$10.5 million, which was above the lodestar. *Perdue*, 559 U.S. at 548. In other words, it was not about a lodestar presumption where a court contemplates *reducing* attorneys’ fees, and thus is distinguishable from the case now before the Court.

Within the twelve-factor test, the Fourth Circuit has declared a plaintiff’s degree of success to be the most crucial component of a fee award inquiry:

As the Supreme Court has recognized, ‘the most critical factor’ in calculating a reasonable fee award ‘is the degree of success obtained,’ and when ‘a plaintiff has achieved only partial or limited success, the [lodestar] may be an excessive amount.’ *Hensley v. Eckerhart*, 461 U.S. 424, 436 (1983) . . . . In accounting for the plaintiff’s limited success, a court should examine ‘the size of the proposed attorney’s fee . . . award in comparison with the total damage award.’ *Thomas v. Peacock*, 39 F.3d 493, 506 (4th Cir. 1994) *rev’d on other grounds*, 516 U.S. 349 (1996). ‘Such comparison promotes the court’s central responsibility to make the assessment of what is a reasonable fee under the circumstances of the case’ . . . . *Farrar [v. Hobby]*, 506 U.S. [103,] 114-15 [(1992)] (quoting *Blanchard v. Bergeron*, 489 U.S. 87, 96 (1989)).

*McDonnell v. Miller Oil Co., Inc.*, 134 F.3d 638, 641 (4th Cir. 1998) (other citations omitted).

After considering the *Johnson* factors and examining a plaintiff’s degree of success, a court can

---

(1) The time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney’s opportunity costs in pressing the instant litigation; (5) the customary fee for like work; (6) the attorney’s expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount in controversy and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between attorney and client; and (12) attorneys’ fees awards in similar cases.

*Barber v. Kimbrell’s Inc.*, 577 F.2d 216, 226 n.28 (4th Cir. 1978).

apply an overall reduction to the lodestar. *See, e.g., Smith v. Loudoun County Pub. Schs.*, No. 1:15-cv-956, 2017 WL 176510, at \*5 (E.D. Va. Jan. 17, 2017) (applying a 25 percent reduction in a plaintiff’s attorneys’ fees, in part because “the amount Plaintiff ultimately recovered was small”).

### III. ANALYSIS

For the reasons that follow, the Court will award in full the compensatory damages and litigation costs, dismiss Counts III-V, and reduce the requested attorneys’ fees.

#### A. Procedural Posture

The Court will dismiss Counts III-V because the allegations supporting Counts I and II largely mirror those required to support the other three counts, and whether default judgment is entered on the three remaining counts would not alter the Court’s findings with respect to compensatory damages because Plaintiffs sought damages jointly on all counts based on the evidence proffered. Additionally, the Court would decline to award attorneys’ fees for any work performed in furtherance of Counts III-V at this stage of the litigation.<sup>3</sup> Therefore, because requiring Plaintiffs to seek default judgment on the remaining Counts would not meaningfully assist in the Court’s determination of an attorneys’ fees award and would waste the parties’ and the Court’s resources, the Court will dismiss Counts III – V so as not to unnecessarily and wastefully prolong this litigation.

#### B. Compensatory Damages and Costs

Having conducted a *de novo* review of the record, the Court adopts and incorporates the findings and recommendations of the Magistrate Judge in full with respect to the award of \$32,966.49 in compensatory damages and \$10,099.43 in costs.

---

<sup>3</sup> It is unclear whether Plaintiffs’ conditional consent to dismiss Counts III-V based on “their right to full recovery,” [Doc. No. 242] at 2, contemplated “full recovery” as measured by the compensatory damage and costs recommended by the Magistrate Judge or also the recommended attorney’s fees. In either event, the Court will dismiss these remaining counts for the reasons stated.

### C. Attorneys' Fees

The Court will apply the three-step test as outlined in *McAfee* to determine the attorneys' fee award in this matter. *McAfee*, 738 F.3d at 88.

#### i. Lodestar

Plaintiffs' attorneys, Warren T. Allen II and Ray D. McKenzie, collectively billed 961.8 hours at \$675 per hour, equating to a lodestar of \$649,228.50 after they applied certain deductions. [Doc. No. 199-J]. Attorneys Allen and McKenzie purported to not request fees related to work performed only with respect to the dismissed Bae Defendants, [Doc. No. 199] at 23; however, they seem to have missed certain line items. *See, e.g.*, [Doc. No. 199-J] at 14 ("Draft follow-up emails to Bae Defendants re: settlement and discovery"); *id.* at 18 ("Review filings and research re: assertions of work product protection to oppose motion by Bae defendants"). Instances where the Court will not award any fees for certain line items are outlined in greater detail in Exhibit 1 attached to this Order.

Additionally, the Court finds the deductions insufficient insofar as work was performed as to both the Bae and Shadetree Defendants. *See, e.g., id.* at 1 ("Research potential claims and background information on potential parties and witnesses."); *id.* at 3 ("Research cases based on discrimination against individuals of West African descent."). Simply put, the Court will not permit Plaintiffs to recover attorneys' fees in full with respect to work performed, even partially, as to Defendants that were awarded summary judgment in their favor. Accordingly, as outlined in Exhibit 1, the Court will reduce line items in the fee request by half where it is either clear that the work applied to both sets of Defendants, or where the billing descriptions are insufficient for the Court to determine how to attribute the work performed. These deductions are consistent with the third *McAfee* step to subtract fees on unsuccessful claims.

The Court will not discount for lodestar purposes any line items that appear to relate solely to the Shadetree Defendants, including all billing entries dated after summary judgment was entered in favor of the Bae Defendants. Ultimately, after applying the aforementioned reductions as outlined in Exhibit 1, the Court finds the lodestar amount to be \$431,500.50.

ii. Johnson Factors

The Court will next apply the *Johnson* factors, as adopted by the Fourth Circuit in *Barber*, notwithstanding the fact that some courts have found certain of these factors less relevant or inapplicable where an application for statutory attorneys' fees largely relates to discovery issues. *See, e.g., United Supreme Council v. United Supreme Council of the Ancient Accepted Scottish Rite for the 33 Degree of Freemasonry*, No. 1:16-cv-1103, 2019 U.S. Dist. LEXIS 222731, at \*4 (E.D. Va. Jan. 17, 2019).

First, as to the time and labor expended, this case was originally filed in February 2020 and Plaintiffs' attorneys have dedicated considerable time and labor to it. With respect to the Shadetree Defendants, Plaintiffs' attorneys have, *inter alia*, opposed a Motion to Dismiss, [Doc. No. 23]; filed an Amended Complaint, [Doc. No. 38]; moved to compel and for sanctions, repeatedly litigated other discovery issues, [Doc. Nos. 43, 63, 76, 91, 97, 132]; and moved for default judgment as to both liability and damages, [Doc. Nos. 144, 198]. Even accounting for the reductions the Court will apply to the lodestar as outlined in Exhibit 1, Plaintiffs' attorneys expended over 600 hours on work attributable to the Shadetree Defendants. This factor weighs in favor of a significant fee award.

With respect to the second and third factors, this case was relatively straightforward and neither contained any particularly novel or difficult questions nor demanded skills above that what would be regularly expected of attorneys appearing before the Court. Plaintiffs sued under

frequently litigated state and federal discrimination laws and state business torts. And the litigation did not proceed to trial but instead ended in default judgment based on discovery failures, again a relatively routine legal issue. Therefore, these factors weigh against a substantial fee award.<sup>4</sup>

As to the fourth factor, it is unclear what the opportunity costs for Plaintiffs' lawyers might have been. However, between August 30, 2019 and January 28, 2022—the first and last billing entry dates on the time sheet—together, on average, even before any reductions are applied, Attorneys McKenzie and Allen each spent less than four hours per week on this litigation, which includes all tasks performed, including those related solely to the Bae Defendants.<sup>5</sup> *See McNeil v. Faneuil, Inc.*, No. 4:15-cv-81, 2017 WL 9771834, at \*5 (E.D. Va. Nov. 8, 2017), *report and recommendation adopted*, 2018 WL 1411017 (E.D. Va. Mar. 21, 2018) (finding with respect to an attorneys' fee application that an average of “less than one hour per day [is] not enough time to preclude a great deal of extra work”). Accordingly, this factor weighs against a substantial award.

As to the fifth factor, the customary fee for civil rights cases is typically not a contingency based on a percentage, but rather statutory fees determined by a lodestar calculation. Accordingly, the Court will consider under this fifth factor whether the hourly fee charged by the attorneys is customary. *See Coggins v. Davis*, No. WGC-05-248, 2007 WL 9782487, at \*4 (D. Md. May 11, 2007) (applying the fifth *Johnson* factor).

Plaintiffs' two attorneys have a combined 47 years of practice, [Doc. No. 199] at 24, which places a \$675 fee within the range of reasonable hourly rates for attorneys of like experience in Northern Virginia. *See Entegree, Inc. v. Metters Indus., Inc.*, No. 1:17-cv-499, 2018 WL 3472819

---

<sup>4</sup> While Plaintiffs' attorneys contend that they “have never had to brief a single opponent's discovery failures or its repeated failures to comply with court orders so many times or to attend so many hearings over such disputes,” [Doc. No. 199] at 24, this is all accounted for in their hours billed. Even accepting Plaintiffs' attorneys' representations as true, the frequency of the Shadetree Defendants' discovery failures do not speak to the novelty, difficulty, or skills required in this litigation.

<sup>5</sup> Plaintiffs' attorneys accounted for 961.8 fee hours over the span of 126 weeks. This averages to 3.8 hours per attorney per week.



(E.D. Va. July 19, 2018) (citing the frequently used hour fee matrix in commercial litigation cases established in *Vienna Metro LLC v. Pulte Home Corp.*, 786 F. Supp. 2d 1090 (E.D. Va. 2011)).

As to the sixth factor, it is unclear from the record what the attorneys' expectations were at the outset of the litigation. However, as reflected in the relatively low compensatory damages, there is little reason to think that the recovery was expected to be substantially beyond what was presented to the Magistrate Judge. On the other hand, the Shadetree Defendants' discovery conduct was egregious and required significantly more attorney time than one would typically expect. Accordingly, this factor weighs in favor of a larger fee award than would typically be awarded to obtain a default judgment of less than \$35,000 in compensatory damages.

Similarly, with respect to the seventh factor, it is unclear what time limitations, if any, were imposed by the client, but the circumstances did require substantially more time litigating discovery disputes than is normal for this type of case. Accordingly, this factor also weighs in favor of a larger fee award.

The eighth factor – the amount in controversy and the results obtained – is by far the most important. *McDonnell*, 134 F.3d at 641. Here, the Amended Complaint did not include a specific demand, but rather sought both compensatory and punitive damages to be proven at trial. [Doc. No. 38] at 31. But in their Motion for Default Judgment as to Damages, Plaintiffs sought only \$32,966.49 in compensatory damages. This can hardly be described as a particularly favorable result for the purposes of seeking *twenty times* as much in attorneys' fees. *See Thomas*, 39 F.3d at 506 (examining “the size of the proposed attorney’s fee . . . award in comparison with the total damage award”); *see also Farrar*, 506 U.S. at 114-15 (finding that comparing the damage award to the attorneys' fees “promotes the court’s central responsibility to make the assessment of what is a reasonable fee under the circumstances of the case”) (quotation omitted). Additionally, while

this suit is based on federal question jurisdiction, it is worth noting that the compensatory damages are less than half of the required amount in controversy had this action been based on diversity jurisdiction. Accordingly, this factor weighs heavily against the requested attorneys' fees.

Attorneys Allen and McKenzie are experienced and evidenced a level of professionalism, competence and diligence that speaks well of them. Accordingly, the ninth factor weighs in their favor. As to the tenth factor, civil rights cases are desirable and there are many attorneys who handle such cases in this District. However, the desirability diminishes in cases like this one with such small compensatory damages; therefore, this factor weighs in their favor. With respect to the eleventh factor, the Court has no information as to the nature and length of the professional relationship between Plaintiffs and their attorneys.

Finally, as to the twelfth factor, the Court has been unable to locate a similar civil rights case where one set of defendants is granted summary judgment in their favor and the other has a default judgment entered against them essentially based on discovery noncompliance, notwithstanding their limited participation in the litigation, and where the compensatory damages are five percent of the requested attorneys' fees. Accordingly, this factor is neutral.

Ultimately, upon consideration of the *Johnson* factors, the Court finds that while certain factors pull in different directions, the most important factor – the results obtained – weighs heavily in favor of an award below the revised lodestar amount. Accordingly, after carefully weighing the *Johnson* factors, the Court will apply a twenty-five (25) percent reduction to the revised \$431,500.50 lodestar<sup>6</sup> and award \$323,625.38 in attorneys' fees.

---

<sup>6</sup> Given the circumstances surrounding the dismissal of Counts III-V, the Court will not subtract further from the award based on the third *McAfee* step, *see McAfee*, 738 F.3d at 88 (identifying the third step as the subtraction of hours spent on unsuccessful claims), as it did based on the unsuccessful claims against the Bae Defendants.

#### IV. CONCLUSION


Accordingly, for the foregoing reasons, it is hereby

**ORDERED** that Counts III-V in the Amended Complaint, [Doc. No. 38], be, and the same hereby are, DISMISSED; and it is further

**ORDERED** based on the Court's adoption in part of the Magistrate Judge's Report and Recommendation, [Doc. No. 240], judgment be, and the same hereby is, entered in favor of Plaintiffs and against Defendants Shadetree Management LLC, Ellen Kim, and Stanley Kyungjin Cho, jointly and severally, in the amount of \$32,966.49 in compensatory damages, \$10,099.43 in costs, and \$323,625.38 in attorneys' fees, for a total judgment of \$366,691.30, with post-judgment interest at the statutory rate.

The Clerk is directed to enter judgment under Rule 58 in accordance with this Order and forward a copy of this Order to all counsel of record.

August 30, 2023  
Alexandria, Virginia

  
\_\_\_\_\_  
Anthony J. Tenga  
Senior U.S. District Judge

## **Exhibit 1**

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (with client)	8/30/2019	Call with client re: factual background and potential claims	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Review/analyze	9/1/2019	Research potential claims and background information on potential parties and witnesses (e.g., tax records, corporate registries, land records, professional licenses, and other public records)	2.7	2.7	\$675.00	\$1,822.50	Warren T. Allen II	50%	\$911.25	Applies to Bae and Shadetree
Communicate (in firm)	9/2/2019	Call with R. McKenzie re: preliminary research findings related to potential claims and to assign follow-up research tasks	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Communicate (in firm)	9/2/2019	Call with W. Allen re: preliminary research findings related to potential claims and to assign follow-up research tasks	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Research	9/2/2019	Research potential discrimination claims	4.4	4.4	\$675.00	\$2,970.00	Warren T. Allen II	50%	\$1,485.00	Applies to Bae and Shadetree
Communicate (in firm)	9/2/2019	Draft correspondence to R. McKenzie re: information obtained from client re: claims and research tasks	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Research	9/2/2019	Research available claims and exhaustion requirements	1.6	1.6	\$675.00	\$1,080.00	Warren T. Allen II	50%	\$540.00	Applies to Bae and Shadetree
Communicate (with client)	9/2/2019	Draft email to client summarizing initial research findings	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (with client)	9/3/2019	Draft and revise summary of research on potential claims and findings re: parties obtained from public record searches for client	1.8	1.8	\$675.00	\$1,215.00	Warren T. Allen II	50%	\$607.50	Applies to Bae and Shadetree
Research	9/3/2019	Conduct research regarding potential claims available under VA and MD state law for the discriminatory acts.	4.5	4.5	\$675.00	\$3,037.50	Ray D. McKenzie	50%	\$1,518.75	Applies to Bae and Shadetree
Communicate (other outside counsel)	9/3/2019	Consult with outside Maryland counsel regarding potential claims available based upon discriminatory acts, specifically claims potentially available pursuant to Maryland state and local law.	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Research	9/3/2019	Research potential claims and background information on potential parties and witnesses (e.g., tax records, corporate registries, land records, professional licenses, and other public records)	3.6	3.6	\$675.00	\$2,430.00	Warren T. Allen II	50%	\$1,215.00	Applies to Bae and Shadetree
Communicate (in firm)	9/4/2019	Draft and respond to emails regarding research into potential claims available under VA and MD law for the discriminatory acts, administrative exhaustion requirements under federal, state, and local law, and relevant statutes of limitations.	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (with client)	9/4/2019	Draft and send client a summary of research and factual findings prepared to facilitate discussion re: potential claims and to respond to client request for info re: potential claims	1.8	1.8	\$675.00	\$1,215.00	Warren T. Allen II	50%	\$607.50	Applies to Bae and Shadetree
Plan and prepare for	9/5/2019	Draft interview outline to prepare for a call to obtain factual background from client	0.8	0.8	\$675.00	\$540.00	Warren T. Allen II	50%	\$270.00	Applies to Bae and Shadetree
Communicate (with client)	9/5/2019	Call with client regarding potential claims	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Communicate (with client)	9/5/2019	Call with client regarding potential claims	1.5	1.5	\$675.00	\$1,012.50	Warren T. Allen II	50%	\$506.25	Applies to Bae and Shadetree
Review/analyze	9/9/2019	Review and revise notes from interview of client in preparation for drafting complaint.	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Review/analyze	9/9/2019	Research sample civil rights complaints to prepare to draft complaint.	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Draft/revise	9/9/2019	Begin drafting civil complaint.	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Draft/revise	9/10/2019	Draft civil complaint	2.6	2.6	\$675.00	\$1,755.00	Ray D. McKenzie	50%	\$877.50	Applies to Bae and Shadetree
Research	9/10/2019	Research jury instructions for Section 1981 and 1982 claims	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Draft/revise	9/10/2019	Review electronic mail and notes from client interview to draft narrative to be used in civil complaint.	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree
Draft/revise	9/11/2019	Draft civil complaint	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Research	9/12/2019	Research principal's liability for agent's discrimination to draft complaint	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Draft/revise	9/13/2019	Draft civil complaint	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Communicate (in firm)	9/13/2019	Draft email summarizing observations re: claims based on review of materials	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Review/analyze	9/13/2019	Review lease to analyze claims and damages	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	50%	\$472.50	Applies to Bae and Shadetree
Communicate (in firm)	9/14/2019	Draft email responding to W. Allen's observations regarding lease agreement.	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	50%	\$101.25	Applies to Bae and Shadetree
Research	9/16/2019	Research public filings re: potential parties and witnesses	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Research	9/17/2019	Research Maryland cases regarding unreasonably withholding consent of an assignment	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Draft/revise	9/17/2019	Draft civil complaint	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Research	9/18/2019	Research Section 1981 claims	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (with client)	9/18/2019	Call with client re: claims and supporting documentation (.5); draft related correspondence with client re: documentation (.6)	1.1	1.1	\$675.00	\$742.50	Warren T. Allen II	50%	\$371.25	Applies to Bae and Shadetree
Communicate (with client)	9/18/2019	Call with client re: claims and relevant documentation	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Review/analyze	9/18/2019	Review documents from the client and create timeline of key events	3.1	3.1	\$675.00	\$2,092.50	Ray D. McKenzie	50%	\$1,046.25	Applies to Bae and Shadetree
Research	9/19/2019	Review S. Cho criminal docket sheet and judgment.	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	0%	\$135.00	Attributable to Shadetree only
Research	9/19/2019	Research re: Maryland implied covenant of good faith contractual relationships and proscription against unreasonably withholding consent to assignment or sublease.	1.4	1.4	\$675.00	\$945.00	Ray D. McKenzie	50%	\$472.50	Applies to Bae and Shadetree
Communicate (in firm)	9/19/2019	Communicate with R. McKenzie re: research findings, preparation for client meeting, and factual background	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (in firm)	9/19/2019	Communicate with W. Allen re: research findings, preparation for client meeting, and factual background	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree
Draft/revise	9/19/2019	Review and analyze documents received from client to draft timeline of key events and emails.	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Draft/revise	9/19/2019	Draft civil complaint.	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Draft/revise	9/20/2019	Draft civil complaint	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Communicate (with client)	9/20/2019	Meet with client to discuss background, case developments, and next steps.	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Communicate (with client)	9/20/2019	Meet with client to discuss background, case developments, and next steps.	1.5	1.5	\$675.00	\$1,012.50	Warren T. Allen II	50%	\$506.25	Applies to Bae and Shadetree
Communicate (with client)	9/20/2019	Draft correspondence to client re: engagement and obtaining supporting documentation to facilitate preparation of complaint	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Research	9/21/2019	Research agency liability issues and admissibility of statements	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Research	9/23/2019	Research corporate standing to bring race discrimination claim	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	9/23/2019	Update timeline of key events and emails based upon client meeting	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Draft/revise	9/23/2019	Update Case Memo factual background/timeline	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Research	9/24/2019	Research cases based on discrimination against individuals of West African descent.	2.4	2.4	\$675.00	\$1,620.00	Ray D. McKenzie	50%	\$810.00	Applies to Bae and Shadetree
Research	9/24/2019	Research re: Fairfax human rights ordinance	2	2	\$675.00	\$1,350.00	Ray D. McKenzie	50%	\$675.00	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Research	9/25/2019	Research Fairfax County Human Rights Ordinance and potential availability of private right of action.	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Communicate (in firm)	9/25/2019	Draft email regarding research re: Fairfax County Human Rights Ordinance and private right of action	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Research	9/26/2019	Research re: section 1982 elements and claims	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Research	9/26/2019	Research legislative history of Virginia statutes and county ordinance prohibiting discrimination	2.3	2.3	\$675.00	\$1,552.50	Warren T. Allen II	50%	\$776.25	Applies to Bae and Shadetree
Research	9/27/2019	Research scope of agency liability for discrimination	2.3	2.3	\$675.00	\$1,552.50	Warren T. Allen II	50%	\$776.25	Applies to Bae and Shadetree
Research	9/30/2019	Research re: race discrimination claims by business entities	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Draft/revise	9/30/2019	Draft civil complaint	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Draft/revise	9/30/2019	Update parties section of case memo	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree
Draft/revise	10/7/2019	Review relevant materials and draft background on parties in case file memorandum	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Research	10/7/2019	Research spousal privilege under federal common, Virginia, and Maryland law	2	2	\$675.00	\$1,350.00	Ray D. McKenzie	50%	\$675.00	Applies to Bae and Shadetree
Research	10/8/2019	Research spousal privilege under federal common law	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Research	10/11/2019	Research elements of Section 1982 claims and update case memo	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Communicate (with client)	10/14/2019	Draft email to client re: status of case and documentation to support claims	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Review/analyze	10/14/2019	Review documents received from client	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree
Review/analyze	10/15/2019	Review documents provided by client and add to timeline of events	1.9	1.9	\$675.00	\$1,282.50	Ray D. McKenzie	50%	\$641.25	Applies to Bae and Shadetree
Review/analyze	10/15/2019	Review and analyze background documents provided by client to draft complaint	1.1	1.1	\$675.00	\$742.50	Warren T. Allen II	50%	\$371.25	Applies to Bae and Shadetree
Research	10/16/2019	Research Stanley Cho CPA license history and update case memo	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	0%	\$337.50	Attributable to Shadetree only
Review/analyze	10/16/2019	Review documents received from the client and update timeline	2.8	2.8	\$675.00	\$1,890.00	Ray D. McKenzie	50%	\$945.00	Applies to Bae and Shadetree
Communicate (in firm)	10/16/2019	Communicate with R. McKenzie re: case strategy and background documents provided by client	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	50%	\$168.75	Applies to Bae and Shadetree
Communicate (in firm)	10/16/2019	Communicate with W. Allen re: case strategy and background documents provided by client	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Communicate (with client)	10/17/2019	Draft emails to client regarding next steps and upcoming meeting	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Review/analyze	10/17/2019	Review documents received from the client and update timeline	2.9	2.9	\$675.00	\$1,957.50	Ray D. McKenzie	50%	\$978.75	Applies to Bae and Shadetree



Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Review/analyze	10/18/2019	Review documents provided by the client and update timeline	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Draft/revise	10/21/2019	Review timeline and draft civil complaint	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Research	10/23/2019	Research application of Maryland long-arm statute and choice of law analysis regarding application of local discrimination ordinance.	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Draft/revise	10/25/2019	Draft C. Williams affidavit	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Draft/revise	10/28/2019	Draft interview outline for C. Williams interview	5.9	5.9	\$675.00	\$3,982.50	Ray D. McKenzie	50%	\$1,991.25	Applies to Bae and Shadetree
Draft/revise	10/29/2019	Draft and revise C. Williams affidavit	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Draft/revise	10/29/2019	Review and revise witness interview outline and affidavit to prepare for meeting with witness	1.1	1.1	\$675.00	\$742.50	Warren T. Allen II	50%	\$371.25	Applies to Bae and Shadetree
Communicate (with client)	10/30/2019	Call with client re: C. Williams interview	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Appear for/attend	10/30/2019	Conduct C. Williams witness interview	1.4	1.4	\$675.00	\$945.00	Ray D. McKenzie	50%	\$472.50	Applies to Bae and Shadetree
Appear for/attend	10/30/2019	Conduct C. Williams witness interview	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	50%	\$472.50	Applies to Bae and Shadetree
Research	10/30/2019	Review filings in upcoming, relevant Supreme Court case: Comcast v. NAAAO.	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Communicate (with client)	11/4/2019	Call with client re: C. Williams interview	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	11/5/2019	Draft and revise civil complaint	3	3	\$675.00	\$2,025.00	Ray D. McKenzie	50%	\$1,012.50	Applies to Bae and Shadetree
Draft/revise	11/6/2019	Draft and revise civil complaint	3.5	3.5	\$675.00	\$2,362.50	Ray D. McKenzie	50%	\$1,181.25	Applies to Bae and Shadetree
Draft/revise	11/10/2019	Draft demand letter	1.7	1.7	\$675.00	\$1,147.50	Ray D. McKenzie	50%	\$573.75	Applies to Bae and Shadetree
Draft/revise	11/11/2019	Revise demand letter	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Draft/revise	11/12/2019	Draft and revise complaint	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Draft/revise	11/13/2019	Draft and revise complaint	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Research	11/14/2019	Research availability of punitive damage under Virginia and Maryland law	1.6	1.6	\$675.00	\$1,080.00	Ray D. McKenzie	50%	\$540.00	Applies to Bae and Shadetree
Draft/revise	11/14/2019	Draft and revise complaint	1.6	1.6	\$675.00	\$1,080.00	Ray D. McKenzie	50%	\$540.00	Applies to Bae and Shadetree
Research	11/15/2019	Read Supreme Court transcript of Comcast discrimination case and briefing regarding applicable pleading standard for Section 1981 claims	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Draft/revise	11/20/2019	Review and revise complaint	1.7	1.7	\$675.00	\$1,147.50	Ray D. McKenzie	50%	\$573.75	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	11/22/2019	Revise demand letters to the defendants	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Communicate (with client)	11/22/2019	Place call and draft email to client re: case update and complaint	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Communicate (in firm)	11/25/2019	Call with W. Allen re: proposed revisions to complaint	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Communicate (in firm)	11/25/2019	Call with R. McKenzie re: proposed revisions to complaint	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Draft/revise	11/26/2019	Revise draft complaint	2.2	2.2	\$675.00	\$1,485.00	Ray D. McKenzie	50%	\$742.50	Applies to Bae and Shadetree
Draft/revise	11/26/2019	Revise drafts of demand letters	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	11/27/2019	Revise complaint	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Communicate (with client)	11/27/2019	Draft email to client re: case update and complaint	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Communicate (other external)	11/27/2019	Place call and draft email to C. Williams re: requested document	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Communicate (with client)	11/29/2019	Communicate with client re: draft filings	0.8	0.8	\$675.00	\$540.00	Warren T. Allen II	50%	\$270.00	Applies to Bae and Shadetree
Research	12/2/2019	Research admission of adoptive or tacit admissions as non-hearsay evidence	3	3	\$675.00	\$2,025.00	Ray D. McKenzie	50%	\$1,012.50	Applies to Bae and Shadetree
Communicate (with client)	12/23/2019	Communicate with client re: revisions to draft complaint	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Communicate (with client)	12/23/2019	Communicate with client re: revisions to draft complaint	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Draft/revise	12/23/2019	Review proposed revisions from client and revise complaint	2.1	2.1	\$675.00	\$1,417.50	Ray D. McKenzie	50%	\$708.75	Applies to Bae and Shadetree
Draft/revise	12/31/2019	Revise and edit draft complaint	1.2	1.2	\$675.00	\$810.00	Ray D. McKenzie	50%	\$405.00	Applies to Bae and Shadetree
Draft/revise	1/2/2020	Revise and edit draft complaint	3.5	3.5	\$675.00	\$2,362.50	Ray D. McKenzie	50%	\$1,181.25	Applies to Bae and Shadetree
Draft/revise	1/2/2020	Review and revise drafts of complaint and demand letters	0.8	0.8	\$675.00	\$540.00	Warren T. Allen II	50%	\$270.00	Applies to Bae and Shadetree
Communicate (other external)	1/8/2020	Draft email to S. Cho and E. Kim re: demand letter and draft complaint	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	0%	\$202.50	Attributable to Shadetree only
Research	1/8/2020	Research sale of Shadetree Management LLC property	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	0%	\$540.00	Attributable to Shadetree only
Review/analyze	1/11/2020	Review and analyze additional emails provided by witness and compare them to previously obtained materials and statement of facts in draft complaint	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	50%	\$472.50	Applies to Bae and Shadetree
Communicate (other external)	1/17/2020	Draft email to S. Cho and E. Kim re: response to demand letter	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	0%	\$405.00	Attributable to Shadetree only
Communicate (in firm)	1/18/2020	Call with R. McKenzie re: defendants' response to complaint	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	50%	\$67.50	Applies to Bae and Shadetree
Communicate (in firm)	1/18/2020	Call with W. Allen re: defendants' response to complaint	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Communicate (with client)	1/18/2020	Call with client re: defendants' response to draft complaint	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (other external)	1/20/2020	Draft and revise correspondence to opposing counsel	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Communicate (with client)	1/20/2020	Draft correspondence to client re: settlement status	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Manage data/files	2/11/2020	Prepare final documents for filing; file complaint and attendant documents	1.6	1.6	\$675.00	\$1,080.00	Ray D. McKenzie	50%	\$540.00	Applies to Bae and Shadetree
Communicate (with client)	2/24/2020	Communicate with client re: identification of opposing counsel and background research	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	50%	\$67.50	Applies to Bae and Shadetree
Communicate (other outside counsel)	2/25/2020	Compile correspondence files for opposing counsel and email them to opposing counsel with request for clarification re: who they are representing	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Appear for/attend	7/14/2020	Attend deposition of Young Woo Bae	6.3	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Research	3/4/2020	Research availability of attorneys' fees in settlements as a prevailing party under 1988	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	100%	\$0.00	Improper to be billed
Communicate (other outside counsel)	3/4/2020	Draft and revise proposed response to defendant's request for counter-offer	1.7	1.7	\$675.00	\$1,147.50	Warren T. Allen II	100%	\$0.00	Description insufficient to state which Defendant made settlement offer
Research	3/4/2020	Research re: discrimination claims	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Communicate (other outside counsel)	3/4/2020	Letter to S. Park re: settlement	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	100%	\$0.00	Description insufficient to state which Defendant made settlement offer
Research	3/5/2020	Research attorney fee awards in settled civil rights cases to respond to defendants' request for counter offer	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	100%	\$0.00	Improper to be billed
Communicate (other outside counsel)	3/5/2020	Revise draft response to opposing counsel's request for a counter offer	2.6	2.6	\$675.00	\$1,755.00	Warren T. Allen II	100%	\$0.00	Description insufficient to state which Defendant made settlement offer
Communicate (other external)	3/6/2020	Email E. Kim, S. Cho, and Shadetree Management LLC re: waiver of service of process	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	0%	\$135.00	Attributable to Shadetree only
Research	3/10/2020	Research service of process rules under state law in anticipation of needing to pursue formal service after defendants Kim, Cho, and Shadetree Management LLC did not respond to waiver	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	0%	\$877.50	Attributable to Shadetree only
Communicate (other external)	3/10/2020	Draft correspondence to process server re: serving Defendants Cho, Kim, and Shadetree Management LLC	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	0%	\$337.50	Attributable to Shadetree only
Communicate (with client)	3/19/2020	Draft correspondence to client re: case developments	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Research	4/8/2020	Research and summarize authority re: an unrepresented entity's ability to participate in a Rule 26(f) conference, local pre-trial conference procedures, and process for obtaining default ruling against business entity for failing to engage counsel	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	50%	\$438.75	Applies to Bae and Shadetree
Draft/revise	4/9/2020	Draft discovery checklist	2.1	2.1	\$675.00	\$1,417.50	Ray D. McKenzie	50%	\$708.75	Applies to Bae and Shadetree
Communicate (with client)	4/10/2020	Communicate with client re: defendant's motion to dismiss, the court's pre-trial order, and case developments	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Communicate (with client)	4/10/2020	Draft correspondence to client re: court ruling, approaching deadlines, and case strategy	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Communicate (with client)	4/11/2020	Communicate with client re: case status updates and defendants' motion to dismiss	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	50%	\$168.75	Applies to Bae and Shadetree
Research	4/11/2020	Conduct research re motion to dismiss	1.9	1.9	\$675.00	\$1,282.50	Ray D. McKenzie	50%	\$641.25	Applies to Bae and Shadetree
Research	4/13/2020	Conduct research re motion to dismiss	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree
Communicate (with client)	4/13/2020	Call with client and W. Allen re: case filings, Rule 26(f) conference, and other case management issues	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Communicate (with client)	4/13/2020	Call with client and R. McKenzie re: case filings, Rule 26(f) conference, and other case management issues	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Review/analyze	7/19/2020	Review Defendants' productions in preparation for S. Cho deposition	2.5	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Review/analyze	7/20/2020	Review defendant's productions in preparation for S. Cho deposition	2	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Communicate (in firm)	4/14/2020	Call with R. McKenzie re: preparing for Rule 26(f) conference, responding to Defendants' motion to dismiss, and case preparation	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Communicate (in firm)	4/14/2020	Call with W. Allen re: preparing for Rule 26(f) conference, responding to Defendants' motion to dismiss, and case preparation	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	50%	\$101.25	Applies to Bae and Shadetree
Communicate (other outside counsel)	4/14/2020	Draft correspondence to opposing counsel re: Rule 26(f) conference scheduling and setting motions for argument	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	4/14/2020	Draft response to defendants' agency arguments	1.7	1.7	\$675.00	\$1,147.50	Warren T. Allen II	50%	\$573.75	Applies to Bae and Shadetree
Research	4/14/2020	Conduct research for response to motion to dismiss	3.2	3.2	\$675.00	\$2,160.00	Ray D. McKenzie	50%	\$1,080.00	Applies to Bae and Shadetree
Communicate (other outside counsel)	4/15/2020	Call with R. McKenzie and counsel for Defendants to prepare discovery plan per Rule 26(f)	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (other outside counsel)	4/15/2020	Call with W. Allen and counsel for Defendants to prepare discovery plan per Rule 26(f)	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Communicate (in firm)	4/15/2020	Call with R. McKenzie re: Rule 26(f) conference and proposed revisions to draft discovery plan	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Communicate (in firm)	4/15/2020	Call with W. Allen to prepare for Rule 26(f) meet and confer	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Draft/revise	4/15/2020	Draft response to motion to dismiss	3.7	3.7	\$675.00	\$2,497.50	Ray D. McKenzie	50%	\$1,248.75	Applies to Bae and Shadetree
Research	4/16/2020	Conduct research re response to motion to dismiss	4.2	4.2	\$675.00	\$2,835.00	Ray D. McKenzie	50%	\$1,417.50	Applies to Bae and Shadetree
Draft/revise	4/16/2020	Draft response to motion to dismiss	3.9	3.9	\$675.00	\$2,632.50	Ray D. McKenzie	50%	\$1,316.25	Applies to Bae and Shadetree
Draft/revise	4/17/2020	Draft response to motion to dismiss	4.6	4.6	\$675.00	\$3,105.00	Ray D. McKenzie	50%	\$1,552.50	Applies to Bae and Shadetree
Research	4/17/2020	Conduct legal research re: response to motion to dismiss	4.8	4.8	\$675.00	\$3,240.00	Ray D. McKenzie	50%	\$1,620.00	Applies to Bae and Shadetree
Draft/revise	4/17/2020	Revise proposed Rule 26(f) discovery plan	3.8	3.8	\$675.00	\$2,565.00	Warren T. Allen II	50%	\$1,282.50	Applies to Bae and Shadetree
Research	4/18/2020	Conduct research re: response to motion to dismiss	4.6	4.6	\$675.00	\$3,105.00	Ray D. McKenzie	50%	\$1,552.50	Applies to Bae and Shadetree
Draft/revise	4/19/2020	Draft response to motion to dismiss	5.8	5.8	\$675.00	\$3,915.00	Ray D. McKenzie	50%	\$1,957.50	Applies to Bae and Shadetree
Communicate (in firm)	4/19/2020	Call with R. McKenzie re: coordinating discovery and disclosures	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Communicate (in firm)	4/19/2020	Call with W. Allen re: coordinating discovery and disclosures	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	50%	\$101.25	Applies to Bae and Shadetree
Communicate (with client)	4/19/2020	Call with client and W. Allen re: initial disclosures, discovery, case status, and litigation strategy	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree
Communicate (with client)	4/19/2020	Call with client and R. McKenzie re: initial disclosures, discovery, case status, and litigation strategy	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Draft/revise	4/19/2020	Revise draft of joint discovery plan and review related authorities	1.1	1.1	\$675.00	\$742.50	Warren T. Allen II	50%	\$371.25	Applies to Bae and Shadetree
Research	4/20/2020	Conduct research re: response to motion to dismiss	5.2	5.2	\$675.00	\$3,510.00	Ray D. McKenzie	50%	\$1,755.00	Applies to Bae and Shadetree
Draft/revise	4/20/2020	Draft response to motion to dismiss	4.5	4.5	\$675.00	\$3,037.50	Ray D. McKenzie	50%	\$1,518.75	Applies to Bae and Shadetree
Research	4/21/2020	Conduct research re: response to motion to dismiss	3.8	3.8	\$675.00	\$2,565.00	Ray D. McKenzie	50%	\$1,282.50	Applies to Bae and Shadetree
Research	4/21/2020	Research issue re: llc members' liability to respond to motion to dismiss	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Research	4/22/2020	Conduct research re: response to motion to dismiss	3.9	3.9	\$675.00	\$2,632.50	Ray D. McKenzie	50%	\$1,316.25	Applies to Bae and Shadetree
Draft/revise	4/22/2020	Revise response to motion to dismiss	2.2	2.2	\$675.00	\$1,485.00	Ray D. McKenzie	50%	\$742.50	Applies to Bae and Shadetree
Draft/revise	4/23/2020	Edit and cite-check response to motion to dismiss	4	4	\$675.00	\$2,700.00	Ray D. McKenzie	50%	\$1,350.00	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (with client)	4/23/2020	Communicate with client re: draft of response to motions to dismiss	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	4/24/2020	Edit and cite check response to motion to dismiss	8.3	8.3	\$675.00	\$5,602.50	Ray D. McKenzie	50%	\$2,801.25	Applies to Bae and Shadetree
Draft/revise	4/26/2020	Prepare initial disclosures and review relevant requirements	2.1	2.1	\$675.00	\$1,417.50	Warren T. Allen II	50%	\$708.75	Applies to Bae and Shadetree
Draft/revise	4/26/2020	Review and edit initial disclosures	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree
Draft/revise	4/27/2020	Draft interrogatories for all defendants	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (in firm)	4/28/2020	Call with R. McKenzie re: coordinating discovery responses and requests	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Draft/revise	4/28/2020	Prepare discovery requests	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	50%	\$101.25	Applies to Bae and Shadetree
Draft/revise	4/28/2020	Draft interrogatories for all defendants	1.1	1.1	\$675.00	\$742.50	Warren T. Allen II	50%	\$371.25	Applies to Bae and Shadetree
Communicate (in firm)	4/28/2020	Call with W. Allen re: discovery and case developments	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree
Communicate (other outside counsel)	4/28/2020	Review local rules, federal rules, and April 10 order; draft revisions to joint discovery plan; and prepare related correspondence to all defendants re: proposed revisions to the plan	1.6	1.6	\$675.00	\$1,080.00	Warren T. Allen II	50%	\$540.00	Applies to Bae and Shadetree
Draft/revise	4/29/2020	Finalize Rule 26(f) Joint Discovery Plan	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (other external)	4/29/2020	Communicate with potential witnesses	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Appear for/attend	7/20/2020	Attend deposition of Defendant E. Kim	7	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	4/29/2020	Prepare initial disclosures	2.9	2.9	\$675.00	\$1,957.50	Warren T. Allen II	50%	\$978.75	Applies to Bae and Shadetree
Appear for/attend	7/21/2020	Attend deposition of S. Cho	8.6	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	4/29/2020	Draft discovery requests	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Review/analyze	4/29/2020	Review/proofread plaintiffs' initial disclosures	0.1	0.1	\$675.00	\$67.50	Ray D. McKenzie	50%	\$33.75	Applies to Bae and Shadetree
Appear for/attend	7/31/2020	Attend C. Williams deposition	6.9	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Review/analyze	4/30/2020	Review defendants' reply briefs	0.8	0.8	\$675.00	\$540.00	Warren T. Allen II	50%	\$270.00	Applies to Bae and Shadetree
Draft/revise	4/30/2020	Draft interview outlines for witness interviews	1.9	1.9	\$675.00	\$1,282.50	Ray D. McKenzie	50%	\$641.25	Applies to Bae and Shadetree
Communicate (other external)	4/30/2020	Interview potential witness	1.2	1.2	\$675.00	\$810.00	Warren T. Allen II	50%	\$405.00	Applies to Bae and Shadetree
Communicate (with client)	4/30/2020	Communicate with client re: witness interview	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	50%	\$67.50	Applies to Bae and Shadetree
Research	5/2/2020	Visit Woodberry Square	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Plan and prepare for	5/4/2020	Review court opinions and briefs to prepare for oral argument on defendants' motions to dismiss	7	7	\$675.00	\$4,725.00	Ray D. McKenzie	50%	\$2,362.50	Applies to Bae and Shadetree
Draft/revise	5/4/2020	Prepare discovery demands to serve on all defendants	1.42	1.42	\$675.00	\$958.50	Warren T. Allen II	50%	\$479.25	Applies to Bae and Shadetree
Plan and prepare for	5/5/2020	Review court opinions and briefs to prepare for oral argument on defendants' motions to dismiss	7.8	7.8	\$675.00	\$5,265.00	Ray D. McKenzie	50%	\$2,632.50	Applies to Bae and Shadetree
Plan and prepare for	5/6/2020	Review court opinions and briefs to prepare for oral argument on defendants' motions to dismiss	8.7	8.7	\$675.00	\$5,872.50	Ray D. McKenzie	50%	\$2,936.25	Applies to Bae and Shadetree
Communicate (other external)	5/6/2020	Coordinate attendance at oral arguments with defendants, court, and client	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	50%	\$67.50	Applies to Bae and Shadetree
Draft/revise	5/6/2020	Draft and revise document production requests for all defendants	2.1	2.1	\$675.00	\$1,417.50	Warren T. Allen II	50%	\$708.75	Applies to Bae and Shadetree
Draft/revise	5/6/2020	Draft requests for production and interrogatories to serve on all defendants	4.9	4.9	\$675.00	\$3,307.50	Warren T. Allen II	50%	\$1,653.75	Applies to Bae and Shadetree
Draft/revise	5/7/2020	Review and edit requests for production	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Communicate (in firm)	5/7/2020	Moot oral argument with co-counsel to prepare for hearing on motions to dismiss by all parties	1.5	1.5	\$675.00	\$1,012.50	Warren T. Allen II	50%	\$506.25	Applies to Bae and Shadetree
Communicate (in firm)	5/7/2020	Moot oral argument with co-counsel to prepare for hearing on motions to dismiss by all parties	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Plan and prepare for	5/8/2020	Prepare for hearing on motions to dismiss	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Appear for/attend	5/8/2020	Attend oral argument on motion to dismiss	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Appear for/attend	5/8/2020	Attend oral argument on motion to dismiss	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	5/8/2020	Draft interrogatories to serve on all defendants	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	50%	\$472.50	Applies to Bae and Shadetree
Review/analyze	5/11/2020	Review order denying all defendants' motions to dismiss	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Communicate (other external)	5/11/2020	Call to interview potential witness re: claims against all defendants	3.3	3.3	\$675.00	\$2,227.50	Warren T. Allen II	50%	\$1,113.75	Applies to Bae and Shadetree
Communicate (other external)	5/11/2020	Call to interview potential witness re: claims against all defendants	3.3	3.3	\$675.00	\$2,227.50	Ray D. McKenzie	50%	\$1,113.75	Applies to Bae and Shadetree
Review/analyze	5/11/2020	Review order denying motions to dismiss	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Communicate (with client)	5/12/2020	Call with client re: order on motions to dismiss, case status, and discovery	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	50%	\$438.75	Applies to Bae and Shadetree
Communicate (with client)	5/12/2020	Communicate with client re: ruling on motion to dismiss and next steps	1.3	1.3	\$675.00	\$877.50	Ray D. McKenzie	50%	\$438.75	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	5/12/2020	Prepare amendment to complaint, motion to amend, and related correspondence to update name of defendant in light of 7.1 disclosure and court's order on motions to dismiss	2.6	2.6	\$675.00	\$1,755.00	Warren T. Allen II	50%	\$877.50	Applies to Bae and Shadetree
Communicate (with client)	5/14/2020	Draft correspondence to client re: case status developments and settlement options	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Review/analyze	5/15/2020	Review second interrogatories	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Draft/revise	5/15/2020	Draft Plaintiffs' second set of interrogatories to all defendants	1.1	1.1	\$675.00	\$742.50	Warren T. Allen II	50%	\$371.25	Applies to Bae and Shadetree
Draft/revise	5/18/2020	Draft correspondents to potential witnesses re: information about all claims against all defendants	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	50%	\$438.75	Applies to Bae and Shadetree
Communicate (in firm)	5/19/2020	Review and draft email re: correspondence to Woodberry Square tenants and opposing counsel	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	50%	\$101.25	Applies to Bae and Shadetree
Draft/revise	5/19/2020	Draft correspondence to opposing counsel re: mediation	1.2	1.2	\$675.00	\$810.00	Warren T. Allen II	50%	\$405.00	Applies to Bae and Shadetree
Communicate (with client)	5/19/2020	Communicate with client re: mediation and settlement issues	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Review/analyze	5/22/2020	Review objections to requests for production of documents and interrogatories	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Review/analyze	5/22/2020	Review and analyze discovery objections and requests	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Research	3/3/2020	Research arguments raised by Bae Defendants' counsel in correspondence in response to demand letter	2.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	5/26/2020	Draft protective order	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Draft/revise	5/26/2020	Draft correspondence to opposing counsel re: coordinating depositions and Bae Defendants' objections to discovery requests	2.1	2.1	\$675.00	\$1,417.50	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Draft/revise	5/27/2020	Draft and revise protective order	2.4	2.4	\$675.00	\$1,620.00	Ray D. McKenzie	50%	\$810.00	Applies to Bae and Shadetree
Draft/revise	5/27/2020	Draft correspondence for all defendants re: coordinating deposition schedules	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Communicate (other outside)	5/28/2020	Draft correspondence to defendants' counsel re: coordinating depositions	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Review/analyze	5/28/2020	Review and begin prepping objections to defendants' discovery requests	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Communicate (other outside counsel)	4/13/2020	Call with counsel for Bae's Woodberry re: scheduling Rule 26(f) conference, setting arguments on motions, and other logistics issues	0.2	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	5/29/2020	Draft allegations and defenses chart	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree



Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (other outside counsel)	4/13/2020	Call with counsel for Bae's Woodberry re: scheduling Rule 26(f) conference, setting arguments on motions, and other logistics issues	0.2	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	5/31/2020	Revise draft joint protective order	1.7	1.7	\$675.00	\$1,147.50	Warren T. Allen II	50%	\$573.75	Applies to Bae and Shadetree
Communicate (with client)	6/1/2020	Call with R. McKenzie and client re: discovery	1	1	\$675.00	\$675.00	Warren T. Allen II	50%	\$337.50	Applies to Bae and Shadetree
Communicate (with client)	6/1/2020	Call with W. Allen and client re: discovery	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Communicate (other outside)	6/1/2020	Call with opposing counsel re: discovery objections	1.6	1.6	\$675.00	\$1,080.00	Warren T. Allen II	50%	\$540.00	Applies to Bae and Shadetree
Draft/revise	6/1/2020	Draft requests for admission	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Draft/revise	6/2/2020	Draft summary of meet and confer call	2.1	2.1	\$675.00	\$1,417.50	Warren T. Allen II	50%	\$708.75	Applies to Bae and Shadetree
Communicate (with client)	6/3/2020	Draft correspondence to client re: discovery requests and case status	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Review/analyze	4/29/2020	Review documents received from Bae Defendants	2.1	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	6/5/2020	Prepare discovery objections	1.2	1.2	\$675.00	\$810.00	Warren T. Allen II	50%	\$405.00	Applies to Bae and Shadetree
Communicate (with client)	6/6/2020	Call with client re: case status and discovery	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Communicate (with client)	6/6/2020	Call with client re: case status and discovery	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree
Draft/revise	6/8/2020	Draft outline for correspondence with opposing counsel re: settlement and approach to resolution	1.9	1.9	\$675.00	\$1,282.50	Warren T. Allen II	50%	\$641.25	Applies to Bae and Shadetree
Communicate (in firm)	6/8/2020	Call with R. McKenzie re: settlement strategy	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (in firm)	6/8/2020	Call with W. Allen re: settlement strategy	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree
Communicate (with client)	6/8/2020	Draft correspondence to client re: settlement options	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	50%	\$438.75	Applies to Bae and Shadetree
Draft/revise	6/8/2020	Draft correspondence to opposing counsel	1.6	1.6	\$675.00	\$1,080.00	Ray D. McKenzie	50%	\$540.00	Applies to Bae and Shadetree
Draft/revise	6/9/2020	Review and revise letter to opposing counsel	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Draft/revise	6/9/2020	Revise settlement letter draft	4.8	4.8	\$675.00	\$3,240.00	Warren T. Allen II	50%	\$1,620.00	Applies to Bae and Shadetree
Review/analyze	6/9/2020	Review document production	1.6	1.6	\$675.00	\$1,080.00	Ray D. McKenzie	50%	\$540.00	Applies to Bae and Shadetree
Review/analyze	6/12/2020	Review and revise communication to opposing counsel re: meet and confer	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Review/analyze	4/29/2020	Review discovery provided by Bae Defendants	0.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Review/analyze	4/29/2020	Review Bae defendants' initial disclosures	0.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Review/analyze	6/12/2020	Review discovery responses	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Communicate (other external)	6/12/2020	Draft meet and confer request email to counsel for Shadetree Defendants due to their failure to respond to discovery requests and failure to file a responsive pleading	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	0%	\$1,620.00	Attributable to Shadetree only
Communicate (with client)	5/22/2020	Draft correspondence to client re: Bae Defendants' discovery requests and objections	0.2	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Communicate (other external)	6/14/2020	Communicate with opposing counsel and third-party witness re: coordinating attendance at deposition	0.8	0.8	\$675.00	\$540.00	Warren T. Allen II	50%	\$270.00	Applies to Bae and Shadetree
Review/analyze	6/15/2020	Review discovery responses from all defendants to summarize deficiencies and to prepare meet and confer requests	2.3	2.3	\$675.00	\$1,552.50	Warren T. Allen II	50%	\$776.25	Applies to Bae and Shadetree
Review/analyze	6/16/2020	Review documents received from client	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Review/analyze	6/17/2020	Review discovery responses by all defendants and prepare follow-up requests	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Draft/revise	6/17/2020	Draft consent motion for protective order	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Review/analyze	6/17/2020	Review and organize documents for production	2.1	2.1	\$675.00	\$1,417.50	Ray D. McKenzie	50%	\$708.75	Applies to Bae and Shadetree
Review/analyze	5/29/2020	Review Bae Defendants' answer to First Amended Complaint and compare to First Amended Complaint	1	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Manage data/files	6/18/2020	Finalize and file consent motion for protective order	1.2	1.2	\$675.00	\$810.00	Ray D. McKenzie	50%	\$405.00	Applies to Bae and Shadetree
Review/analyze	5/30/2020	Review Bae Defendants' Answer to Amended Complaint and email Shadetree Defendants' counsel to ascertain the status of their Answer	0.2	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Research	6/18/2020	Conduct research re: discovery requests	2.7	2.7	\$675.00	\$1,822.50	Ray D. McKenzie	50%	\$911.25	Applies to Bae and Shadetree
Communicate (other external)	6/18/2020	Draft email to witness	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	6/19/2020	Draft correspondence for Shadetree Defendants summarizing discovery deficiencies. Drafting entailed review of each request, response, and the applicable rules to summarize deficiencies	4.3	4.3	\$675.00	\$2,902.50	Warren T. Allen II	0%	\$2,902.50	Attributable to Shadetree only
Review/analyze	6/19/2020	Review documents to prepare for production	7.6	7.6	\$675.00	\$5,130.00	Ray D. McKenzie	50%	\$2,565.00	Applies to Bae and Shadetree
Draft/revise	6/20/2020	Draft and revise third set of interrogatories and second set of requests for production	1.2	1.2	\$675.00	\$810.00	Warren T. Allen II	50%	\$405.00	Applies to Bae and Shadetree
Draft/revise	6/20/2020	Prepare discovery responses	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Review/analyze	6/20/2020	Review and revise correspondence to counsel re: discovery deficiencies	1.3	1.3	\$675.00	\$877.50	Ray D. McKenzie	50%	\$438.75	Applies to Bae and Shadetree
Draft/revise	6/20/2020	Draft follow-up emails to Bae Defendants re: settlement and discovery	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Communicate (with client)	6/20/2020	Communicate with client re: settlement, discovery responses, and case status developments	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Review/analyze	6/21/2020	Review and prepare clients' discovery responses	1.7	1.7	\$675.00	\$1,147.50	Warren T. Allen II	50%	\$573.75	Applies to Bae and Shadetree
Communicate (with client)	6/21/2020	Call with client re: document production	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Draft/revise	6/22/2020	Process production documents and draft written responses	8.7	8.7	\$675.00	\$5,872.50	Ray D. McKenzie	50%	\$2,936.25	Applies to Bae and Shadetree
Draft/revise	6/5/2020	Finalize discovery objections and send them to Bae's Woodberry Defendants	0.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Communicate (with client)	6/12/2020	Call with client re: settlement proposal and case status	1.3	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Research	6/24/2020	Conduct research re: Motion to Compel	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	0%	\$1,215.00	Attributable to Shadetree only
Draft/revise	6/24/2020	Draft deposition notices	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Communicate (other external)	6/24/2020	Call with potential witness re: misconduct allegation regarding S. Cho	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Draft/revise	6/25/2020	Draft privilege log	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Communicate (other outside)	6/25/2020	Meet and confer with Shadetree counsel	1.4	1.4	\$675.00	\$945.00	Ray D. McKenzie	0%	\$945.00	Attributable to Shadetree only
Draft/revise	6/25/2020	Draft memo to file re: meet and confer with Shadetree counsel	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	0%	\$1,215.00	Attributable to Shadetree only
Communicate (other outside counsel)	6/25/2020	Call with counsel for Shadetree Defendants to attempt to narrow the scope of disagreements ahead of filing a motion to compel	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	0%	\$945.00	Attributable to Shadetree only
Draft/revise	6/25/2020	Draft motion to compel discovery responses from Shadetree Defendants	4.6	4.6	\$675.00	\$3,105.00	Warren T. Allen II	0%	\$3,105.00	Attributable to Shadetree only
Research	6/26/2020	Conduct research re: motion to compel discovery responses from Shadetree Defendants	1.6	1.6	\$675.00	\$1,080.00	Ray D. McKenzie	0%	\$1,080.00	Attributable to Shadetree only
Draft/revise	6/12/2020	Finalize letter to Bae Defendants re: proposed settlement	1.2	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	6/26/2020	Draft motion to compel productions from Shadetree Defendants and sanction requests	7.7	7.7	\$675.00	\$5,197.50	Warren T. Allen II	0%	\$5,197.50	Attributable to Shadetree only
Draft/revise	6/27/2020	Draft motion to compel production from Shadetree Defendants and sanction request	6.4	6.4	\$675.00	\$4,320.00	Warren T. Allen II	0%	\$4,320.00	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	6/28/2020	Draft motion to compel production from Shadetree Defendants and cost request	4.7	4.7	\$675.00	\$3,172.50	Warren T. Allen II	0%	\$3,172.50	Attributable to Shadetree only
Draft/revise	6/28/2020	Review and suggest edits to motion to compel and brief in support; finalize draft and exhibits for filing	3.6	3.6	\$675.00	\$2,430.00	Ray D. McKenzie	0%	\$2,430.00	Attributable to Shadetree only
Review/analyze	6/29/2020	Review discovery demands to C. Williams and analyze for objections	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Review/analyze	6/13/2020	Review and analyze Bae Defendants' document productions to determine compliance with requests	1.9	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	6/29/2020	Draft objections to discovery demands to C. Williams	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	50%	\$506.25	Applies to Bae and Shadetree
Communicate (other outside counsel)	6/17/2020	Draft correspondence to counsel for Bae defendants re: third-party subpoena	0.9	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Communicate (other outside counsel)	6/30/2020	Communicate with all defendants re: deposition scheduling, discovery, and motions hearing	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	50%	\$202.50	Applies to Bae and Shadetree
Draft/revise	6/18/2020	Draft correspondence to counsel for Bae Defendants summarizing discovery deficiencies	3.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	6/22/2020	Prepare responses to Bae Defendants' first discovery demands	8.4	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Communicate (other external)	7/2/2020	Call with potential witness	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (with client)	7/3/2020	Call with client re: case status updates, discovery responses, and vendor payment	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Communicate (other external)	6/23/2020	Draft correspondence to counsel for Bae defendants re: depositions and discovery responses	0.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	7/3/2020	Draft 30(b)(6) deposition notices	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree
Communicate (with client)	7/3/2020	Call with client re: case status updates, discovery responses, and vendor payment	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	50%	\$168.75	Applies to Bae and Shadetree
Review/analyze	7/6/2020	Review opposition to motion to compel	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	0%	\$337.50	Attributable to Shadetree only
Review/analyze	7/6/2020	Review Bae's Woodberry 7/6/2020 (Korean Language) production	2	2	\$675.00	\$1,350.00	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Draft/revise	7/7/2020	Draft additional interrogatories to serve on defendants; finalize 30(b)(6) deposition notices	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Communicate (other outside counsel)	7/7/2020	Communicate with opposing counsel re: deposition notices and arrangements with vendor	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	50%	\$101.25	Applies to Bae and Shadetree
Draft/revise	7/8/2020	Draft Brief in Reply to Shadetree Defendants' Response to Motion to Compel	4.3	4.3	\$675.00	\$2,902.50	Warren T. Allen II	0%	\$2,902.50	Attributable to Shadetree only
Review/analyze	7/8/2020	Review defendants' objections to plaintiffs' latest discovery requests	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	7/9/2020	Identify exhibits and draft deposition outline	2.8	2.8	\$675.00	\$1,890.00	Ray D. McKenzie	50%	\$945.00	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	7/9/2020	Draft brief in reply	6.4	6.4	\$675.00	\$4,320.00	Warren T. Allen II	0%	\$4,320.00	Attributable to Shadetree only
Draft/revise	7/9/2020	Review and edit reply to motion to compel	1.2	1.2	\$675.00	\$810.00	Ray D. McKenzie	0%	\$810.00	Attributable to Shadetree only
Plan and prepare for	7/10/2020	Review potential deposition exhibits and prepare for deposition	3.7	3.7	\$675.00	\$2,497.50	Ray D. McKenzie	50%	\$1,248.75	Applies to Bae and Shadetree
Communicate	7/10/2020	Email case status update to client	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and
Plan and prepare for	7/11/2020	Draft deposition outline and identify exhibits	5.4	5.4	\$675.00	\$3,645.00	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Plan and prepare for	7/13/2020	Prepare for deposition	2.3	2.3	\$675.00	\$1,552.50	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Plan and prepare for	7/13/2020	Prepare for deposition, finalize exhibits	5.3	5.3	\$675.00	\$3,577.50	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Appear for/attend	7/14/2020	Conduct deposition of Young Woo Bae	6.3	6.3	\$675.00	\$4,252.50	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Review/analyze	6/26/2020	Review and analyze Bae Defendants revised document productions and responses to discovery requests and concerns	0.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	7/15/2020	Draft requests for admission and interrogatories to serve on all defendants	5.6	5.6	\$675.00	\$3,780.00	Warren T. Allen II	50%	\$1,890.00	Applies to Bae and Shadetree
Review/analyze	7/15/2020	Review notes from deposition	1.7	1.7	\$675.00	\$1,147.50	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Communicate (other external)	7/15/2020	Calls with potential witnesses	0.8	0.8	\$675.00	\$540.00	Warren T. Allen II	50%	\$270.00	Applies to Bae and Shadetree
Communicate (other external)	7/15/2020	Calls with potential witnesses	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Draft/revise	7/15/2020	Draft additional discovery requests	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	50%	\$607.50	Applies to Bae and Shadetree
Draft/revise	6/29/2020	Draft correspondence to Bae Defendants re: narrowing scope of disagreements about discovery and coordinating meet and confer	0.4	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Review/analyze	6/30/2020	Review supplemental production from Bae Defendants	1.5	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Plan and prepare for	7/17/2020	Prepare for meet and confer call with J. Huh by reviewing correspondence re: open issues, reviewing documents Mr. Huh produced immediately before the call, researching availability of tax information in cases involving punitive damages, and summarizing open areas of dispute	2.9	2.9	\$675.00	\$1,957.50	Warren T. Allen II	0%	\$1,957.50	Attributable to Shadetree only
Communicate (other external)	7/17/2020	Call with J. Huh re: open meet and confer issues	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Communicate (other outside)	7/17/2020	Meet and confer with J. Huh	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	0%	\$405.00	Attributable to Shadetree only
Draft/revise	7/17/2020	Draft amended privilege log	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Review/analyze	7/1/2020	Review Bae's Woodberry supplemental production	1.1	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Review/analyze	7/2/2020	Review revised discovery responses and supplemental production from Bae's Woodberry	0.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Review/analyze	7/17/2020	Review documents produced by Shadetree Defendants	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	0%	\$1,012.50	Attributable to Shadetree only
Review/analyze	7/3/2020	Review Bae's Woodberry supplemental production	1.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Communicate (other outside counsel)	7/16/2020	Prepare response to Bae Defendants' concerns re: third-party production and work product assertions	3.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Research	7/18/2020	Research discovery issues	6.5	6.5	\$675.00	\$4,387.50	Ray D. McKenzie	50%	\$2,193.75	Applies to Bae and Shadetree
Plan and prepare for	7/18/2020	Prepare for deposition of Shadetree defendants by reviewing document productions, researching authority on potential legal issues, preparing interview outline, and selecting exhibits	5.9	5.9	\$675.00	\$3,982.50	Warren T. Allen II	0%	\$3,982.50	Attributable to Shadetree only
Plan and prepare for	7/19/2020	Prepare for deposition of Shadetree defendants by reviewing document productions, researching authority on potential legal issues, preparing interview outline, and selecting exhibits	10.8	10.8	\$675.00	\$7,290.00	Warren T. Allen II	0%	\$7,290.00	Attributable to Shadetree only
Draft/revise	7/19/2020	Draft supplement to initial disclosures	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Draft/revise	7/19/2020	Draft supplemental privilege log	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	50%	\$168.75	Applies to Bae and Shadetree
Draft/revise	7/16/2020	Review and suggest edits for correspondence to counsel re: discovery; draft supplemental response to discovery requests	1	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Plan and prepare for	7/17/2020	Prepare for meet and confer call with Bae Defendants, including drafting a summary of open areas of disagreement	1.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Plan and prepare for	7/20/2020	Prepare for deposition of Shadetree defendants by reviewing document productions, researching authority on potential legal issues, preparing interview outline, and selecting exhibits	6.1	6.1	\$675.00	\$4,117.50	Warren T. Allen II	0%	\$4,117.50	Attributable to Shadetree only
Appear for/attend	7/20/2020	Conduct deposition of Defendant Ellen Kim	7	7	\$675.00	\$4,725.00	Warren T. Allen II	0%	\$4,725.00	Attributable to Shadetree only
Communicate (other outside counsel)	7/17/2020	Call with counsel for Bae Defendants re: meet and confer over open discovery disputes	0.5	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Plan and prepare for	7/21/2020	Prepare for Shadetree defendants' depositions by reviewing background materials, drafting interview outlines, analyzing legal arguments, and selecting exhibits	4.7	4.7	\$675.00	\$3,172.50	Warren T. Allen II	0%	\$3,172.50	Attributable to Shadetree only
Plan and prepare for	7/21/2020	Depose witness S. Cho	8.6	8.6	\$675.00	\$5,805.00	Warren T. Allen II	0%	\$5,805.00	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Plan and prepare for	7/17/2020	Prepare for meet and confer call with Bae Defendants, including drafting a summary of open areas of disagreement	1.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Plan and prepare for	7/17/2020	Call with counsel for Bae Defendants re: meet and confer over open discovery disputes	0.5	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Appear for/attend	7/22/2020	Participate in telephonic discovery conference with Judge Davis and parties' counsel re: motion to compel	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	0%	\$472.50	Attributable to Shadetree only
Research	7/22/2020	Research issues related to potential discovery dispute	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	0%	\$742.50	Attributable to Shadetree only
Appear for/attend	7/22/2020	Participate in conference with Court and opposing counsel re: Plaintiffs' Motion to Compel	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	0%	\$472.50	Attributable to Shadetree only
Review/analyze	7/23/2020	Review filings and research re: assertions of work product protection to oppose motion by Bae defendants	2.3	2.3	\$675.00	\$1,552.50	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Communicate (other external)	7/21/2020	Draft correspondence to address Bae Defendants' discovery and disclosure inquiries	0.3	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Review/analyze	7/25/2020	Review Shadetree 7/24/20 and 7/25/20 productions	3.9	3.9	\$675.00	\$2,632.50	Ray D. McKenzie	0%	\$2,632.50	Attributable to Shadetree only
Review/analyze	7/25/2020	Review Bae Defendants' Motions to Compel and for Sanctions	2.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	7/27/2020	Draft notice re Shadetree discovery responses following motion to compel	3.3	3.3	\$675.00	\$2,227.50	Ray D. McKenzie	0%	\$2,227.50	Attributable to Shadetree only
Draft/revise	7/27/2020	Update Plaintiffs' initial disclosures, document production, and other discovery materials	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	50%	\$472.50	Applies to Bae and Shadetree
Draft/revise	7/26/2020	Draft opposition to Bae Defendants' motions to compel and for sanctions against C. Williams and Light Your Vision LLC	5.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	7/27/2020	Draft and revise notice to Court re: discovery dispute and status conference	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	50%	\$810.00	Applies to Bae and Shadetree
Communicate (other external)	7/27/2020	Meet and confer with opposing counsel for Bae Defendants re: privilege log disclosures, work product analysis, and other discovery disputes	0.5	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Communicate (other external)	7/27/2020	Call with witness re: motion to compel and deposition testimony	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Appear for/attend	7/28/2020	Appear for status conference with Judge Davis at 3:30 and at 4:00 p.m.	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	0%	\$337.50	Attributable to Shadetree only
Draft/revise	7/28/2020	Draft and revise notice to court re: compliance with discovery demands pursuant to July 22, 2020 order on motion to compel against Shadetree Defendants	2.7	2.7	\$675.00	\$1,822.50	Warren T. Allen II	0%	\$1,822.50	Attributable to Shadetree only
Appear for/attend	7/28/2020	Appear for status conference with Judge Davis at 3:30 and at 4:00 p.m.	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	0%	\$337.50	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (other outside counsel)	7/28/2020	Calls with J. Huh and assistant re: judge's order to appear for status conference	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	0%	\$135.00	Attributable to Shadetree only
Review/analyze	7/28/2020	Review transcripts of testimony by Defendants Cho and Kim	3.3	3.3	\$675.00	\$2,227.50	Warren T. Allen II	0%	\$2,227.50	Attributable to Shadetree only
Review/analyze	7/28/2020	Review S. Cho and E. Kim deposition transcripts and other materials to prepare for C. Bae deposition	9	9	\$675.00	\$6,075.00	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Review/analyze	7/29/2020	Review documents to prepare for deposition	9.7	9.7	\$675.00	\$6,547.50	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Communicate (other outside counsel)	7/27/2020	Meet and confer with counsel for Bae Defendants	0.6	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Communicate (with client)	7/29/2020	Draft correspondence to client re: case status	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	50%	\$135.00	Applies to Bae and Shadetree
Communicate (with client)	7/29/2020	Call with client re: case status	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Review/analyze	7/29/2020	Review Bae Defendant's 7-22-20 supplemental production to prepare for C. Bae deposition	0.9	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Plan and prepare for	7/29/2020	Prepare materials for C. Williams to review for deposition testimony.	1.7	1.7	\$675.00	\$1,147.50	Warren T. Allen II	50%	\$573.75	Applies to Bae and Shadetree
Draft/revise	7/30/2020	Draft brief in opposition to motion to compel	6	6	\$675.00	\$4,050.00	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Draft/revise	7/29/2020	Draft opposition to Bae Defendants' motion to compel	4.7	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	7/30/2020	Draft and revise opposition to motion to compel.	7.6	7.6	\$675.00	\$5,130.00	Warren T. Allen II	100%	\$0.00	Attributable to Bae only
Appear for/attend	7/30/2020	Depose C. Bae	8	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Appear for/attend	7/31/2020	Attend deposition of C. Williams	6.9	6.9	\$675.00	\$4,657.50	Warren T. Allen II	50%	\$2,328.75	Applies to Bae and Shadetree
Communicate (with client)	8/2/2020	Prepare client for deposition	2.5	2.5	\$675.00	\$1,687.50	Warren T. Allen II	50%	\$843.75	Applies to Bae and Shadetree
Communicate (with client)	8/2/2020	Meet with client for case update and prepare for upcoming deposition	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Communicate (with client)	8/3/2020	Correspondence to client re: materials for deposition preparation	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Review/analyze	8/3/2020	Review latest Shadetree production	4	4	\$675.00	\$2,700.00	Ray D. McKenzie	0%	\$2,700.00	Attributable to Shadetree only
Research	8/3/2020	Research objections from defendants to prepare for meet and confer	1.1	1.1	\$675.00	\$742.50	Ray D. McKenzie	50%	\$371.25	Applies to Bae and Shadetree
Review/analyze	8/3/2020	Review supplemental documents received from client	1.2	1.2	\$675.00	\$810.00	Ray D. McKenzie	50%	\$405.00	Applies to Bae and Shadetree
Communicate (other outside counsel)	8/3/2020	Meet and confer with I. Khan re discovery issues	0.2	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Communicate (with client)	8/4/2020	Draft correspondence to client re document production and case status	0.8	0.8	\$675.00	\$540.00	Ray D. McKenzie	50%	\$270.00	Applies to Bae and Shadetree
Draft/revise	8/4/2020	Draft second supplemental discovery responses and prepare supplemental document production	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	50%	\$236.25	Applies to Bae and Shadetree



Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Appear for/attend	8/5/2020	Appear for B. Mamadou deposition	7.5	7.5	\$675.00	\$5,062.50	Ray D. McKenzie	50%	\$2,531.25	Applies to Bae and Shadetree
Appear for/attend	8/5/2020	Attend deposition	7.5	7.5	\$675.00	\$5,062.50	Warren T. Allen II	50%	\$2,531.25	Applies to Bae and Shadetree
Plan and prepare for	8/5/2020	Prepare for deposition	3.1	3.1	\$675.00	\$2,092.50	Warren T. Allen II	0%	\$2,092.50	Attributable to Shadetree only
Review/analyze	8/5/2020	Review and select exhibits for Shadetree deposition	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	0%	\$1,012.50	Attributable to Shadetree only
Communicate (other outside	8/5/2020	Meet and confer with J. Huh	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	0%	\$405.00	Attributable to Shadetree only
Plan and prepare for	8/6/2020	Prepare for Shadetree 30(b)(6) deposition	3.6	3.6	\$675.00	\$2,430.00	Warren T. Allen II	0%	\$2,430.00	Attributable to Shadetree only
Appear for/attend	8/6/2020	Appear for Shadetree deposition	7	7	\$675.00	\$4,725.00	Ray D. McKenzie	0%	\$4,725.00	Attributable to Shadetree only
Appear for/attend	8/6/2020	Depose Shadetree Management	6.9	6.9	\$675.00	\$4,657.50	Warren T. Allen II	0%	\$4,657.50	Attributable to Shadetree only
Draft/revise	8/6/2020	Draft Motion to Compel Bae Defendants' responses to discovery requests	6.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	8/6/2020	Draft notice to court re: motion to compel status	3.3	3.3	\$675.00	\$2,227.50	Warren T. Allen II	0%	\$2,227.50	Attributable to Shadetree only
Draft/revise	8/7/2020	Draft notice re motion to compel	3.6	3.6	\$675.00	\$2,430.00	Warren T. Allen II	0%	\$2,430.00	Attributable to Shadetree only
Plan and prepare for	8/7/2020	Prepare for oral argument on Bae Defendants' motion to compel third-party production	1.5	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	8/7/2020	Revise motion to compel discovery responses and extend discovery deadline	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	0%	\$1,012.50	Attributable to Shadetree only
Draft/revise	8/7/2020	Revise motion to compel production against Bae Defendants	0.9	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Research	8/7/2020	Research issues for motion to compel discovery responses and extend discovery deadline	1.5	1.5	\$675.00	\$1,012.50	Ray D. McKenzie	0%	\$1,012.50	Attributable to Shadetree only
Appear for/attend	8/7/2020	Join hearing on Baes' motion to compel third-party discovery	0.4	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Appear for/attend	8/7/2020	Attend hearing with Judge Davis re pending Motion to Compel	0.4	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Appear for/attend	8/7/2020	Join hearing on plaintiffs' motion to compel Shadetree Defendants' discovery responses	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	0%	\$202.50	Attributable to Shadetree only
Appear for/attend	8/7/2020	Attend hearing with Judge Davis re Motion to Compel Shadetree	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	0%	\$202.50	Attributable to Shadetree only
Review/analyze	8/10/2020	Review Baes' Motion for Protective Order	0.7	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	8/11/2020	Draft response to Baes' Motion for Protective Order	4.5	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	8/12/2020	Revise opposition to motion for protective order	1.3	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	8/12/2020	Revise brief in opposition to motion for protective order	2.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Review/analyze	8/12/2020	Review Bae Defendants' opposition to Plaintiffs' motion to compel	0.3	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	8/13/2020	Edit and file reply in support of motion to compel	0.7	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	8/13/2020	Draft brief in reply to Bae Defendants' opposition to Plaintiffs' motion to compel	6.3	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	8/13/2020	Draft notice re: Shadetree Defendants' discovery deficiencies	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	0%	\$877.50	Attributable to Shadetree only
Draft/revise	8/13/2020	Update privilege log; prepare supplemental disclosure	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	50%	\$202.50	Applies to Bae and Shadetree
Draft/revise	8/13/2020	Update initial disclosures	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	50%	\$168.75	Applies to Bae and Shadetree
Review/analyze	8/13/2020	Review defendant productions	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Communicate (other external)	8/13/2020	Participate in meet and confer call with Bae Defendants' counsel	0.4	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Communicate (with client)	8/14/2020	Call with client re: supplemental disclosure	0.2	0.2	\$675.00	\$135.00	Ray D. McKenzie	50%	\$67.50	Applies to Bae and Shadetree
Draft/revise	8/14/2020	Draft supplemental response to document requests	0.4	0.4	\$675.00	\$270.00	Ray D. McKenzie	50%	\$135.00	Applies to Bae and Shadetree
Draft/revise	8/14/2020	Draft and revise notice re: Shadetree Defendants' discovery deficiencies	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	0%	\$877.50	Attributable to Shadetree only
Plan and prepare for	8/14/2020	Attend hearing on Bae Defendants' Motion to Compel, Bae Defendants' Motion for a Protective Order, and Plaintiffs' Motion to Compel the Bae Defendants' productions	1.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Appear for/attend	8/14/2020	Appear for motions hearing before Judge Davis	1.1	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Draft/revise	8/17/2020	Draft email to opposing counsel re: proposed path to resolve outstanding and potential discovery disputes	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	0%	\$337.50	Attributable to Shadetree only
Draft/revise	8/17/2020	Draft outline of proposed omnibus resolution of all open discovery disputes to try to facilitate resolution and further negotiation with opposing counsel	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Communicate (other outside counsel)	8/18/2020	Meet and confer call with J. Huh re: response to discovery disputes and requests for sanctions	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	0%	\$472.50	Attributable to Shadetree only
Review/analyze	8/18/2020	Review document productions to prepare for meet and confer call with J. Huh re: discovery disputes	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	0%	\$472.50	Attributable to Shadetree only
Communicate (with client)	8/18/2020	Draft correspondence to client re: case status developments	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Draft/revise	8/18/2020	Draft brief in opposition to Bae Defendants' motion to compel	4.7	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Communicate (other outside)	8/18/2020	Meet and confer with J. Huh re: discovery hearing on 8/21/20	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	0%	\$472.50	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Research	8/18/2020	Conduct research re: spoliation of evidence	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	0%	\$1,215.00	Attributable to Shadetree only
Plan and prepare for	8/18/2020	Select trial exhibits in preparation for final pretrial conference	2.6	2.6	\$675.00	\$1,755.00	Ray D. McKenzie	50%	\$877.50	Applies to Bae and Shadetree
Review/analyze	8/19/2020	Review productions and select potential trial exhibits	6.7	6.7	\$675.00	\$4,522.50	Ray D. McKenzie	50%	\$2,261.25	Applies to Bae and Shadetree
Research	8/19/2020	Research re: motion to compel plaintiffs' work product	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Draft/revise	8/19/2020	Review and propose edits to opposition to motion to compel plaintiffs' work product	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	100%	\$0.00	Attributable to Bae only
Draft/revise	8/19/2020	Draft brief in opposition to Bae Defendants motion to compel	11.7	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Research	8/19/2020	Review cases on spoliation and circumstantial proof of spoliation	4.7	4.7	\$675.00	\$3,172.50	Gary A. Rubin	0%	\$3,172.50	Attributable to Shadetree only
Communicate (in firm)	8/19/2020	Call regarding strategy for sanctions research	0.3	0.3	\$675.00	\$202.50	Gary A. Rubin	0%	\$202.50	Attributable to Shadetree only
Review/analyze	8/20/2020	Review productions and select potential trial exhibits	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	50%	\$843.75	Applies to Bae and Shadetree
Plan and prepare for	8/20/2020	Prepare for oral argument on Bae Defendants' motion to compel Plaintiffs' work product	2.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	8/20/2020	Draft notice re: motion to compel and status of Shadetree Defendants compliance with court orders	4.4	4.4	\$675.00	\$2,970.00	Warren T. Allen II	0%	\$2,970.00	Attributable to Shadetree only
Review/analyze	8/20/2020	Review and analyze cases on spoliation	2.9	2.9	\$675.00	\$1,957.50	Gary A. Rubin	0%	\$1,957.50	Attributable to Shadetree only
Draft/revise	8/20/2020	Draft section of spoliation notice	1.9	1.9	\$675.00	\$1,282.50	Gary A. Rubin	0%	\$1,282.50	Attributable to Shadetree only
Draft/revise	8/21/2020	Draft and file motion to continue final pretrial conference	1	1	\$675.00	\$675.00	Ray D. McKenzie	50%	\$337.50	Applies to Bae and Shadetree
Plan and prepare for	8/21/2020	Prepare for oral argument on Bae Defendants' motion to compel Plaintiffs' work product	2.2	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	8/21/2020	Draft Notice re Motion to Compel and status of Shadetree Defendants' compliance with court orders	3.7	3.7	\$675.00	\$2,497.50	Warren T. Allen II	50%	\$1,248.75	Applies to Bae and Shadetree
Appear for/attend	8/21/2020	Appear for discovery hearing on Defendants' Motion for Protective Order and Motion to Compel	0.9	0.9	\$675.00	\$607.50	Ray D. McKenzie	50%	\$303.75	Applies to Bae and Shadetree
Appear for/attend	8/21/2020	Attend discovery hearing on multiple discovery motions	0.9	0.9	\$675.00	\$607.50	Warren T. Allen II	50%	\$303.75	Applies to Bae and Shadetree
Appear for/attend	8/21/2020	Appear for discovery hearing on Plaintiffs' Motion to Compel Shadetree	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	0%	\$405.00	Attributable to Shadetree only
Appear for/attend	8/21/2020	Attend discovery hearing on Motion to Compel Shadetree	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Communicate (other external)	8/26/2020	Draft email to witness C. Williams re: potential trial schedule and holding dates for testimony	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	8/31/2020	Revise privilege log to provide additional details per the Court's August 21, 2020 order	6.8	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae only
Draft/revise	9/1/2020	Revise privilege log per the Court's August 21, 2020 order	1.8	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	9/1/2020	Review and finalize amended privilege log	0.8	0	\$675.00	\$0.00	Ray D. McKenzie	0%	\$0.00	Correctly attributable to Bae
Review/analyze	9/8/2020	Review Shadetree defendants' objections to Judge Davis's discovery orders	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	0%	\$135.00	Attributable to Shadetree only
Review/analyze	9/8/2020	Review Bae defendants' objections to Judge Davis's discovery orders	0.2	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	9/8/2020	Draft and revise errata sheet	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Review/analyze	9/8/2020	Address response to Shadetree rule 72 objection.	2.9	2.9	\$675.00	\$1,957.50	Gary A. Rubin	0%	\$1,957.50	Attributable to Shadetree only
Communicate (in firm)	9/9/2020	Call re: strategy for responding to Shadetree objections.	0.5	0.5	\$675.00	\$337.50	Gary A. Rubin	0%	\$337.50	Attributable to Shadetree only
Review/analyze	9/9/2020	Prepare response to Shadetree rule 72 objections.	3.1	3.1	\$675.00	\$2,092.50	Gary A. Rubin	0%	\$2,092.50	Attributable to Shadetree only
Review/analyze	9/11/2020	Review legal issues regarding Shadetree objections.	2.9	2.9	\$675.00	\$1,957.50	Gary A. Rubin	0%	\$1,957.50	Attributable to Shadetree only
Review/analyze	9/12/2020	Review cases on standard of review on issues raised in Shadetree objections.	5.1	5.1	\$675.00	\$3,442.50	Gary A. Rubin	0%	\$3,442.50	Attributable to Shadetree only
Draft/revise	9/14/2020	Work on response to Shadetree objections.	3.1	3.1	\$675.00	\$2,092.50	Gary A. Rubin	0%	\$2,092.50	Attributable to Shadetree only
Draft/revise	9/15/2020	Prepare deposition errata sheet	5.9	5.9	\$675.00	\$3,982.50	Warren T. Allen II	50%	\$1,991.25	Applies to Bae and Shadetree
Draft/revise	9/17/2020	Draft responses to Bae Defendants' Rule 72 objections	2.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	9/17/2020	Draft sections of response to Shadetree rule 72 objection	5.8	5.8	\$675.00	\$3,915.00	Gary A. Rubin	0%	\$3,915.00	Attributable to Shadetree only
Draft/revise	9/18/2020	Draft facts section of Shadetree rule 72 response.	3.9	3.9	\$675.00	\$2,632.50	Gary A. Rubin	0%	\$2,632.50	Attributable to Shadetree only
Draft/revise	9/19/2020	Revise draft response to Shadetree Defendants Rule 72 objections	4.1	4.1	\$675.00	\$2,767.50	Warren T. Allen II	0%	\$2,767.50	Attributable to Shadetree only
Draft/revise	9/19/2020	Draft argument sections of Shadetree rule 72 response.	6.1	6.1	\$675.00	\$4,117.50	Gary A. Rubin	0%	\$4,117.50	Attributable to Shadetree only
Draft/revise	9/20/2020	Draft revisions to response to Bae Defendants' Rule 72 Objection	2.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	9/20/2020	Prepare materials in support of fee award to respond to Shadetree Defendants Rule 72 objections	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	0%	\$1,620.00	Attributable to Shadetree only
Draft/revise	9/20/2020	Edit initial draft of Shadetree rule 72 response.	6.2	6.2	\$675.00	\$4,185.00	Gary A. Rubin	0%	\$4,185.00	Attributable to Shadetree only
Draft/revise	9/21/2020	Prepare materials in support of fee award to respond to Shadetree Defendants Rule 72 objections	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Draft/revise	9/21/2020	Draft response to Bae Defendants Rule 72 objections	6.6	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	9/21/2020	Edit response to Shadetree rule 72 objection.	7.8	0	\$675.00	\$0.00	Gary A. Rubin	0%	\$0.00	Correctly attributable to Bae
Draft/revise	9/22/2020	Final review of brief opposing Shadetree Objections before filing (not included in fee request submissions)	2	2	\$675.00	\$1,350.00	Warren T. Allen II	100%	\$0.00	Description states charge not to be included, but fee still billed
Draft/revise	9/22/2020	Draft response to Bae Defendants' objections	3.1	0	\$675.00	\$0.00	Warren T. Allen II	0%	\$0.00	Correctly attributable to Bae
Draft/revise	9/22/2020	Draft response to Shadetree Defendants' Rule 72 Objections	8.4	8.4	\$675.00	\$5,670.00	Warren T. Allen II	0%	\$5,670.00	Attributable to Shadetree only
Draft/revise	9/22/2020	Revise and finalize brief opposing Rule 72 objections to Davis order denying motion to compel work product production	5.7	5.7	\$675.00	\$3,847.50	Ray D. McKenzie	0%	\$3,847.50	Attributable to Shadetree only
Draft/revise	9/22/2020	Finalize exhibits for Rule 72 response	2.1	2.1	\$675.00	\$1,417.50	Gary A. Rubin	0%	\$1,417.50	Attributable to Shadetree only
Draft/revise	9/22/2020	Edit and finalize Rule 72 response	3.1	3.1	\$675.00	\$2,092.50	Gary A. Rubin	0%	\$2,092.50	Attributable to Shadetree only
Communicate (with client)	9/23/2020	Draft correspondence to client re: case status update and filings	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (other outside counsel)	9/23/2020	Draft proposed correspondence to opposing counsel re: fee award and local rule requirement	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	50%	\$101.25	Applies to Bae and Shadetree
Communicate (other outside counsel)	10/1/2020	Call with J. Huh to confer re: proposed amendments to the Shadetree Defendants' responses to RFAs	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	0%	\$337.50	Attributable to Shadetree only
Communicate (other external)	10/1/2020	Draft correspondence to counsel for Shadetree Defendants re: meeting and conferring re: proposed amendments to their RFA responses	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	0%	\$1,620.00	Attributable to Shadetree only
Communicate (other outside counsel)	10/1/2020	Meet and confer with J. Huh regarding Shadetree RFA failures	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	0%	\$337.50	Attributable to Shadetree only
Communicate (with client)	10/2/2020	Draft correspondence to client re: case status updates on request for admissions	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	50%	\$236.25	Applies to Bae and Shadetree
Communicate (other external)	10/2/2020	Review correspondence and draft filings from Shadetree Defendants and respond with comments and proposed revisions	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	0%	\$202.50	Attributable to Shadetree only
Communicate (other external)	10/27/2020	Research Rule 7(e) notice requirements for Rule 72 objections and draft correspondence to opposing counsel re: same	2.8	2.8	\$675.00	\$1,890.00	Warren T. Allen II	0%	\$1,890.00	Attributable to Shadetree only
Communicate (other external)	10/30/2020	Draft correspondence with opposing counsel regarding sanctions and settlement	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Review/analyze	11/2/2020	Review and comment on proposed motion for leave to waive oral argument.	0.3	0.3	\$675.00	\$202.50	Gary A. Rubin	0%	\$202.50	Attributable to Shadetree only
Communicate (other external)	11/3/2020	Call with J. Huh re: motion to compel and motion for sanctions	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	0%	\$202.50	Attributable to Shadetree only
Communicate (other external)	11/3/2020	Meet-and-confer call with Shadetree's counsel.	0.7	0.7	\$675.00	\$472.50	Gary A. Rubin	0%	\$472.50	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (with client)	11/9/2020	Call with client re: case developments	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Communicate (with client)	11/9/2020	Call with client regarding next steps	0.6	0.6	\$675.00	\$405.00	Ray D. McKenzie	0%	\$405.00	Attributable to Shadetree only
Communicate (other external)	11/18/2020	Draft correspondence to Defendants and Court re: rescheduling settlement discussions	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	0%	\$472.50	Attributable to Shadetree only
Communicate (other outside counsel)	1/4/2021	Draft email to J. Huh regarding his clients' failure to comply with ECF No. 103	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	0%	\$472.50	Attributable to Shadetree only
Draft/revise	1/20/2021	Draft Rule 37(b) motion based on Shadetree Defendant's refusal to comply with Court's earlier sanctions order awarding attorneys' fees	4.7	4.7	\$675.00	\$3,172.50	Warren T. Allen II	0%	\$3,172.50	Attributable to Shadetree only
Communicate (with client)	1/21/2021	Draft correspondence to client re: case status update and discovery motion	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Draft/revise	1/21/2021	Review and propose edits to motion for sanctions	0.7	0.7	\$675.00	\$472.50	Ray D. McKenzie	0%	\$472.50	Attributable to Shadetree only
Draft/revise	1/21/2021	Draft motion for sanctions against Shadetree Defendants for failure to comply with Court's prior sanctions order	4.4	4.4	\$675.00	\$2,970.00	Warren T. Allen II	0%	\$2,970.00	Attributable to Shadetree only
Draft/revise	1/21/2021	Review and edit sanctions motion	0.5	0.5	\$675.00	\$337.50	Gary A. Rubin	0%	\$337.50	Attributable to Shadetree only
Draft/revise	1/22/2021	Draft motion for further sanctions against the Shadetree Defendants for refusal to comply with the Court's prior sanctions order	7.6	7.6	\$675.00	\$5,130.00	Warren T. Allen II	0%	\$5,130.00	Attributable to Shadetree only
Draft/revise	1/22/2021	Review audio files and update record cites; propose edits to memo in support of motion for further sanctions; draft motion and proposed order	2.1	2.1	\$675.00	\$1,417.50	Ray D. McKenzie	0%	\$1,417.50	Attributable to Shadetree only
Draft/revise	1/22/2021	Conduct final proofread and file motion for further sanctions, memorandum in support, proposed order, and notice of hearing	1.2	1.2	\$675.00	\$810.00	Ray D. McKenzie	0%	\$810.00	Attributable to Shadetree only
Draft/revise	1/22/2021	Review and edit sanctions motion	2.1	2.1	\$675.00	\$1,417.50	Gary A. Rubin	0%	\$1,417.50	Attributable to Shadetree only
Communicate (other external)	1/26/2021	Draft correspondence to client and nonparty witness re: case status update	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	0%	\$472.50	Attributable to Shadetree only
Draft/revise	1/27/2021	Draft brief in Reply to Shadetree Defendants opposition	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	0%	\$1,620.00	Attributable to Shadetree only
Review/analyze	1/27/2021	Review reply brief	0.3	0.3	\$675.00	\$202.50	Gary A. Rubin	0%	\$202.50	Attributable to Shadetree only
Draft/revise	1/28/2021	Edit reply brief	1.4	1.4	\$675.00	\$945.00	Gary A. Rubin	0%	\$945.00	Attributable to Shadetree only
Plan and prepare for	2/5/2021	Prepare for oral argument on motion for further sanctions against Shadetree Defendants	2.6	2.6	\$675.00	\$1,755.00	Warren T. Allen II	0%	\$1,755.00	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Appear for/attend	2/5/2021	Attend hearing on motion for sanctions	1.8	1.8	\$675.00	\$1,215.00	Warren T. Allen II	0%	\$1,215.00	Attributable to Shadetree only
Communicate (with client)	2/5/2021	Draft correspondence to client re: status update and potential strategic options	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Communicate (other external)	2/5/2021	Draft and revise correspondence with opposing counsel re: Shadetree Defendants' sanctions and potential settlement options	1.8	1.8	\$675.00	\$1,215.00	Warren T. Allen II	0%	\$1,215.00	Attributable to Shadetree only
Draft/revise	2/9/2021	Prepare and file corrected exhibit to reply brief seeking further sanctions against the Shadetree Defendants	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	0%	\$945.00	Attributable to Shadetree only
Draft/revise	2/10/2021	Draft, revise, and file response to Shadetree Defendants' request to reduce Plaintiffs' fees	1.9	1.9	\$675.00	\$1,282.50	Warren T. Allen II	0%	\$1,282.50	Attributable to Shadetree only
Communicate (with client)	2/11/2021	Communicate with client re: case status developments and settlement	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Draft/revise	3/5/2021	Draft and revise motion to continue	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	0%	\$877.50	Attributable to Shadetree only
Communicate (with client)	3/9/2021	Communicate with client re: rescheduling trial and case status update	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	0%	\$202.50	Attributable to Shadetree only
Communicate (other external)	3/9/2021	Inform witness of rescheduled trial dates	0.1	0.1	\$675.00	\$67.50	Warren T. Allen II	0%	\$67.50	Attributable to Shadetree only
Review/analyze	5/21/2021	Review Judge Davis's recommendation and report and update client re: same	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Communicate (with client)	5/24/2021	Draft correspondence to client re: case status	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	0%	\$202.50	Attributable to Shadetree only
Research	9/15/2021	Research evidentiary issue in preparation for call with client regarding next steps	0.3	0.3	\$675.00	\$202.50	Ray D. McKenzie	0%	\$202.50	Attributable to Shadetree only
Research	9/16/2021	Research evidentiary issue re: use of deposition transcripts	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	0%	\$945.00	Attributable to Shadetree only
Communicate (with client)	9/17/2021	Call with client to discuss recent default judgment order and next steps	1	1	\$675.00	\$675.00	Ray D. McKenzie	0%	\$675.00	Attributable to Shadetree only
Communicate (with client)	9/17/2021	Call with client re: case status	1	1	\$675.00	\$675.00	Warren T. Allen II	0%	\$675.00	Attributable to Shadetree only
Draft/revise	9/28/2021	Prepare motion for attorneys' fees	3.4	3.4	\$675.00	\$2,295.00	Warren T. Allen II	0%	\$2,295.00	Attributable to Shadetree only
Draft/revise	9/30/2021	Draft motion for attorneys fees per order of the Court	5.6	5.6	\$675.00	\$3,780.00	Warren T. Allen II	0%	\$3,780.00	Attributable to Shadetree only
Draft/revise	10/3/2021	Draft motion for attorneys' fees	6.6	6.6	\$675.00	\$4,455.00	Warren T. Allen II	0%	\$4,455.00	Attributable to Shadetree only
Draft/revise	10/4/2021	Finalize revisions to motion for attorneys' fees	1.4	1.4	\$675.00	\$945.00	Warren T. Allen II	0%	\$945.00	Attributable to Shadetree only
Research	10/5/2021	Research potential response to Shadetree Defendants' most recent failures to comply with discovery orders	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	0%	\$1,620.00	Attributable to Shadetree only

Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Communicate (with client)	10/13/2021	Draft correspondence to client re: motion for sanctions, case strategy, and case status	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Draft/revise	10/13/2021	Finalize notice	0.3	0.3	\$675.00	\$202.50	Gary A. Rubin	0%	\$202.50	Attributable to Shadetree only
Draft/revise	10/24/2021	Draft correspondence re: upcoming hearing and case status for client and non-party witness	0.7	0.7	\$675.00	\$472.50	Warren T. Allen II	0%	\$472.50	Attributable to Shadetree only
Plan and prepare for	10/25/2021	Prepare for oral argument by reviewing criminal contempt standards, prior filings, and available sanctions	1.3	1.3	\$675.00	\$877.50	Warren T. Allen II	0%	\$877.50	Attributable to Shadetree only
Draft/revise	10/27/2021	Draft brief in reply to Shadetree Defendants' opposition brief	7.1	7.1	\$675.00	\$4,792.50	Warren T. Allen II	0%	\$4,792.50	Attributable to Shadetree only
Draft/revise	10/28/2021	Draft and revise reply brief	1.2	1.2	\$675.00	\$810.00	Warren T. Allen II	0%	\$810.00	Attributable to Shadetree only
Plan and prepare for	10/28/2021	Prepare for oral arguments on motions for sanctions	4.4	4.4	\$675.00	\$2,970.00	Warren T. Allen II	0%	\$2,970.00	Attributable to Shadetree only
Draft/revise	12/7/2021	Review and revise supplemental briefing regarding fees	1.3	1.3	\$675.00	\$877.50	Ray D. McKenzie	0%	\$877.50	Attributable to Shadetree only
Draft/revise	12/7/2021	Draft supplemental memorandum in support of motion for attorneys' fees per the Court's December 3 order	4.1	4.1	\$675.00	\$2,767.50	Warren T. Allen II	0%	\$2,767.50	Attributable to Shadetree only
Draft/revise	12/8/2021	Draft supplemental memorandum in support of motion for attorneys' fees per the Court's December 3 order	2.4	2.4	\$675.00	\$1,620.00	Warren T. Allen II	0%	\$1,620.00	Attributable to Shadetree only
Draft/revise	12/15/2021	Draft settlement demand correspondence, including researching ethics issue and researching civil contempt standards	3.4	3.4	\$675.00	\$2,295.00	Warren T. Allen II	0%	\$2,295.00	Attributable to Shadetree only
Draft/revise	12/17/2021	Prepare revisions to settlement demand language	0.4	0.4	\$675.00	\$270.00	Warren T. Allen II	0%	\$270.00	Attributable to Shadetree only
Draft/revise	12/20/2021	Prepare revisions to settlement demand language	0.3	0.3	\$675.00	\$202.50	Warren T. Allen II	0%	\$202.50	Attributable to Shadetree only
Communicate (other external)	1/5/2022	Respond to settlement offer from Shadetree Defendants	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	0%	\$135.00	Attributable to Shadetree only
Research	1/5/2022	Research rules re: imposing damages on default judgment	2.2	2.2	\$675.00	\$1,485.00	Warren T. Allen II	0%	\$1,485.00	Attributable to Shadetree only
Communicate (with client)	1/5/2022	Draft correspondence to client re: settlement offer and status conference outcome	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	0%	\$135.00	Attributable to Shadetree only
Appear for/attend	1/5/2022	Attend status conference re: damages and trial date	0.2	0.2	\$675.00	\$135.00	Warren T. Allen II	0%	\$135.00	Attributable to Shadetree only
Research	1/6/2022	Conduct research in preparation for briefing Plaintiffs' position on damages	2.5	2.5	\$675.00	\$1,687.50	Ray D. McKenzie	0%	\$1,687.50	Attributable to Shadetree only
Review/analyze	1/19/2022	Review cases on contempt	1.9	1.9	\$675.00	\$1,282.50	Gary A. Rubin	0%	\$1,282.50	Attributable to Shadetree only
Draft/revise	1/20/2022	Draft contempt motion	2.8	2.8	\$675.00	\$1,890.00	Gary A. Rubin	0%	\$1,890.00	Attributable to Shadetree only



Item	Date	Description	Hours Worked	Hours for Fee App.	Rate	Total	Billed By	Court Reduction	Court Adjusted Total	Justification (based on description)
Draft/revise	1/21/2022	Draft comments on motion for civil contempt show cause hearing against all Shadetree Defendants	0.5	0.5	\$675.00	\$337.50	Warren T. Allen II	0%	\$337.50	Attributable to Shadetree only
Review/analyze	1/22/2022	Review documentation relating to damages to prepare for drafting position on damages	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	0%	\$1,215.00	Attributable to Shadetree only
Review/analyze	1/24/2022	Conduct legal and factual research in preparation for drafting Plaintiffs' position on damages	2.3	2.3	\$675.00	\$1,552.50	Ray D. McKenzie	0%	\$1,552.50	Attributable to Shadetree only
Draft/revise	1/24/2022	Revise motion for order to show cause	0.9	0.9	\$675.00	\$607.50	Gary A. Rubin	0%	\$607.50	Attributable to Shadetree only
Research	1/24/2022	Review cases on rule 37 contempt	1.1	1.1	\$675.00	\$742.50	Gary A. Rubin	0%	\$742.50	Attributable to Shadetree only
Draft/revise	1/25/2022	Revise memorandum in support of motion for contempt	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Draft/revise	1/25/2022	Draft Plaintiffs' position on damages	1.8	1.8	\$675.00	\$1,215.00	Ray D. McKenzie	0%	\$1,215.00	Attributable to Shadetree only
Review/analyze	1/25/2022	Address rule 37 and contempt issues	0.3	0.3	\$675.00	\$202.50	Gary A. Rubin	0%	\$202.50	Attributable to Shadetree only
Draft/revise	1/26/2022	Edit contempt brief and draft related papers	3.1	3.1	\$675.00	\$2,092.50	Gary A. Rubin	0%	\$2,092.50	Attributable to Shadetree only
Draft/revise	1/27/2022	Draft Plaintiffs' position on damages	5.7	5.7	\$675.00	\$3,847.50	Ray D. McKenzie	0%	\$3,847.50	Attributable to Shadetree only
Draft/revise	1/28/2022	Draft Plaintiffs' position on damages	2.1	2.1	\$675.00	\$1,417.50	Ray D. McKenzie	0%	\$1,417.50	Attributable to Shadetree only
Review/analyze	1/28/2022	Review and analyze damages documentation	3.2	3.2	\$675.00	\$2,160.00	Ray D. McKenzie	0%	\$2,160.00	Attributable to Shadetree only
Communicate (with client)	1/28/2022	Draft emails to client regarding Plaintiffs' position on damages	0.5	0.5	\$675.00	\$337.50	Ray D. McKenzie	0%	\$337.50	Attributable to Shadetree only
Communicate (other outside counsel)	1/28/2022	Communicate with counsel for Shadetree Defendants re: motion for contempt and motion for default as to liability; draft follow-up correspondence to counsel for Shadetree Defendants documenting substance of call	0.6	0.6	\$675.00	\$405.00	Warren T. Allen II	0%	\$405.00	Attributable to Shadetree only
Draft/revise	1/28/2022	Draft final revisions to motion for contempt, related memorandum in support, notice of hearing, and proposed order	1.2	1.2	\$675.00	\$810.00	Warren T. Allen II	0%	\$810.00	Attributable to Shadetree only
<b>Total</b>				<b>961.8</b>		<b>\$649,228.50</b>		<b>N/A</b>	<b>\$431,500.50</b>	